

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL)
PRESCRIPTION OPIATE)
LITIGATION)
) MDL No. 2804
THIS DOCUMENT RELATES TO:) Case No. 17-md-2804
Track Nine: Tarrant)
County, Texas) Judge Dan Aaron Polster
)
(Case No.)
1:18-op-45274-DAP)

ORAL AND VIDEOTAPED DEPOSITION OF
CHERYL BENNETT-WRIGHT
AUGUST 28, 2023

ORAL AND VIDEOTAPED DEPOSITION OF CHERYL
BENNETT-WRIGHT, produced as a witness at the instance of
the Defendants, and duly sworn, was taken in the
above-styled and numbered cause on the 28th day of June,
2023, from 10:08 a.m. to 12:31 p.m., before Julie C.
Brandt, RMR, CRR, and CSR in and for the State of Texas,
reported by machine shorthand at Veritext, 300
Throckmorton Street, Suite 1600, Fort Worth, Texas,
pursuant to the Federal Rules of Civil Procedure.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2 FOR THE PLAINTIFF TARRANT COUNTY:</p> <p>3 Leila Ayachi (via Zoom)</p> <p>4 Alex AYACHI (via Zoom)</p> <p>5 The Lanier Law Firm, PC</p> <p>6 10940 W. Sam Houston Pkwy N., Suite 100</p> <p>7 Houston, Texas 77064</p> <p>8 713-659-5200</p> <p>9 alex.abston@lanierlawfirm.com</p> <p>10 leila.ayachi@lanierlawfirm.com</p> <p>11 FOR THE ALBERTSONS DEFENDANTS:</p> <p>12 Quinn Ford</p> <p>13 GREENBERG TRAUIG, LLP</p> <p>14 77 West Wacker Drive, Suite 3100</p> <p>15 Chicago, Illinois 60601</p> <p>16 312-456-8400</p> <p>17 quinn.ford@gtlaw.com</p> <p>18 FOR THE KROGER DEFENDANTS:</p> <p>19 Kiley Aycock (via Zoom)</p> <p>20 QUILLING SELANDER LOWNDS WINSLETT & MOSER</p> <p>21 2001 Bryan Street, Suite 1800</p> <p>22 Dallas, Texas 75201</p> <p>23 214-871-2100</p> <p>24 kaycock@qslwm.com</p> <p>25 ALSO PRESENT:</p> <p>Keith Ogle - Tarrant County Asst. Criminal D.A.</p> <p>Sadie Turner - Turner Law Firm (via Zoom)</p> <p>Megan King - Veritext Videographer</p>	<p style="text-align: right;">Page 4</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: We're on the record at</p> <p>3 10:08 a.m. on August 28, 2023. This is the deposition</p> <p>4 of Cheryl Bennett-Wright, in the matter of In Re</p> <p>5 National Prescription Opiate Litigation, filed in the</p> <p>6 Northern District of Ohio, Eastern Division, Case No.</p> <p>7 17-md-2804.</p> <p>8 At this time, Counsel, please state your</p> <p>9 appearances for the record.</p> <p>10 MR. FORD: Quinn Ford, from Greenberg</p> <p>11 Traurig appearing on behalf of Albertsons, the</p> <p>12 Albertsons defendants.</p> <p>13 MR. OGLE: Keith Ogle, Assistant Criminal</p> <p>14 District Attorney for Tarrant County.</p> <p>15 MS. AYACHI: My name is Leila Ayachi and</p> <p>16 I'm representing Tarrant County, and Alex Abston and</p> <p>17 Sadie Turner are also from The Lanier Law Firm.</p> <p>18 MS. AYCOCK: Kiley Aycock, I'm with</p> <p>19 Quilling Selander, and I'm here for Kroger.</p> <p>20 CHERYL BENNETT-WRIGHT,</p> <p>21 having been first duly sworn, testified as follows:</p> <p>22 EXAMINATION</p> <p>23 BY MR. FORD:</p> <p>24 Q. Good morning.</p> <p>25 A. Good morning.</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances..... 2</p> <p>4 Proceedings..... 4</p> <p>5 CHERYL BENNETT-WRIGHT</p> <p>6 Examination by Mr. Ford..... 4</p> <p>7 Signature and Changes..... 98</p> <p>8 Reporter's Certificate..... 100</p> <p>9 DEPOSITION EXHIBITS IDENTIFIED</p> <p>10 Exhibit 1 6/9/2016 email string 11</p> <p>11 TARRANT_00933890 - 00933891</p> <p>12 Exhibit 2 LinkedIn bio 16</p> <p>13 Exhibit 3 8/22/2012 email and attachment 47</p> <p>14 TARRANT_00532693 - 00532694</p> <p>15 Exhibit 4 9/29/2021 email string and 50</p> <p>16 attachments</p> <p>17 TARRANT_00900009 - 00900220</p> <p>18 Exhibit 5 7/22/2022 email and attachment 68</p> <p>19 TARRANT_00912945 - 00912956</p> <p>20 Exhibit 6 9/18/2018 email and attachments 74</p> <p>21 TARRANT_00947739 - 0094740</p> <p>22 Exhibit 7 9/16/2021 email and attachment 79</p> <p>23 TARRANT_00899703 - 00899704</p> <p>24 Exhibit 8 3/3/2021 email and attachment 85</p> <p>25 TARRANT_00920917 - 00920938</p>	<p style="text-align: right;">Page 5</p> <p>1 Q. I'm going to repeat what I said a couple of</p> <p>2 moments ago. My name is Quinn Ford. I'm an attorney</p> <p>3 representing Albertsons in this lawsuit.</p> <p>4 Could you please state your name for the</p> <p>5 record.</p> <p>6 A. Cheryl Bennett-Wright.</p> <p>7 Q. And would you prefer I refer to you as</p> <p>8 Ms. Bennett-Wright or Ms. Wright today during the</p> <p>9 deposition?</p> <p>10 A. You can say Ms. Bennett-Wright is fine.</p> <p>11 Q. Ms. Bennett-Wright, okay. Thank you.</p> <p>12 Ms. Bennett-Wright, what is your date of</p> <p>13 birth?</p> <p>14 A. 10/4 of '68.</p> <p>15 Q. And what is your current address?</p> <p>16 A. 2423 Campfire Creek Drive, Arlington, Texas.</p> <p>17 Q. Is that in Tarrant County?</p> <p>18 A. It is.</p> <p>19 Q. How long have you lived in Tarrant County for?</p> <p>20 A. About 30 years.</p> <p>21 Q. Have you ever given a deposition before?</p> <p>22 A. I have not.</p> <p>23 Q. Have you ever testified in a court proceeding</p> <p>24 before?</p> <p>25 A. I have.</p>

<p style="text-align: right;">Page 6</p> <p>1 Q. When was that?</p> <p>2 A. It was so long ago I don't remember.</p> <p>3 Q. Was it one time or multiple times?</p> <p>4 A. I would say a couple of times.</p> <p>5 Q. Do you remember sort of the setting? For</p> <p>6 instance, was it a trial?</p> <p>7 A. It was a criminal trial, yes.</p> <p>8 Q. Okay. So I'm just going to go over some basic</p> <p>9 deposition ground rules today, if that's okay.</p> <p>10 The first is breaks. This deposition will</p> <p>11 likely take at least a couple of hours. So if at any</p> <p>12 time you need to take a break, please let me know. I'm</p> <p>13 happy to, you know, accommodate you. The one thing I</p> <p>14 ask is if a question is pending, if I've asked a</p> <p>15 question, that you answer the question first and then we</p> <p>16 can take a break whenever you want. Is that fair?</p> <p>17 A. Yes.</p> <p>18 Q. The court reporter here, Julie, will be taking</p> <p>19 down everything that's said today. And it's important</p> <p>20 for everyone to get a clean transcript, so some of the</p> <p>21 things we usually say is try to speak clearly and</p> <p>22 slowly. Also, please let me finish my question before</p> <p>23 you begin giving your answer. I know it's easy</p> <p>24 sometimes to know where I'm going and I might speak</p> <p>25 slowly, but for the transcript's sake, please let me</p>	<p style="text-align: right;">Page 8</p> <p>1 A. No.</p> <p>2 Q. Okay. Thank you.</p> <p>3 And the court reporter just put you under</p> <p>4 oath, and you promised to testify truthfully today.</p> <p>5 Will you agree to answer my questions truthfully and to</p> <p>6 the best of your ability?</p> <p>7 A. Yes.</p> <p>8 Q. Thank you.</p> <p>9 So I want to talk now a little bit about the</p> <p>10 background of why we're here. Do you know why you're</p> <p>11 here today?</p> <p>12 A. Yes.</p> <p>13 Q. Can you explain to me why you -- you know, you</p> <p>14 understand that you're here today?</p> <p>15 A. I am here for a deposition on the opioid case.</p> <p>16 Q. When you say the opioid case, what are you</p> <p>17 referring to?</p> <p>18 A. An opioid case between pharmacies and Tarrant</p> <p>19 County.</p> <p>20 Q. What do you know about that lawsuit?</p> <p>21 A. That's about it.</p> <p>22 Q. Do you know any of the claims that Tarrant</p> <p>23 County is bringing in the lawsuit?</p> <p>24 A. I do not.</p> <p>25 Q. Do you know if someone asked you describe the</p>
<p style="text-align: right;">Page 7</p> <p>1 finish the question.</p> <p>2 Also, you know, a lot of people respond uh-huh</p> <p>3 or huh-uh for yes or no. Please respond with a yes or</p> <p>4 no, because it helps out for the transcript.</p> <p>5 Also, if you don't understand a question,</p> <p>6 please let me know. I'm happy to rephrase it or</p> <p>7 clarify. But if you answer a question, I will take that</p> <p>8 and assume that you understood it.</p> <p>9 Lastly, your counsel may object to certain</p> <p>10 questions I ask today. Just to let you know, even if</p> <p>11 your counsel objects, you're obligated to provide an</p> <p>12 answer unless your counsel specifically instructs you</p> <p>13 not to answer.</p> <p>14 Do you understand all that?</p> <p>15 A. Yes.</p> <p>16 Q. Ms. Bennett-Wright, are you under the</p> <p>17 influence of alcohol or any illegal drugs right now?</p> <p>18 A. No.</p> <p>19 Q. Have you taken any prescription drugs that you</p> <p>20 think will prevent you from testifying competently</p> <p>21 today?</p> <p>22 A. No.</p> <p>23 Q. Do you have any -- do you currently have any</p> <p>24 health issues that you think will prevent you from</p> <p>25 testifying competently today?</p>	<p style="text-align: right;">Page 9</p> <p>1 lawsuit, how would you describe it?</p> <p>2 A. An opioid case between Tarrant County and the</p> <p>3 opioids companies and pharmacies.</p> <p>4 Q. Have you ever heard the phrase "opioid</p> <p>5 epidemic"?</p> <p>6 A. I have.</p> <p>7 Q. What does that phrase mean to you?</p> <p>8 A. Epidemic means it's widespread. Opioid was a</p> <p>9 pain killer.</p> <p>10 Q. So you just sort of got to my next question.</p> <p>11 How would you define the term "opioid"?</p> <p>12 A. As a pain killer.</p> <p>13 Q. Pain killer.</p> <p>14 Have you ever heard of the term "prescription</p> <p>15 opioid"?</p> <p>16 A. Yes.</p> <p>17 Q. What does that term mean to you?</p> <p>18 A. A doctor wrote a prescription for it.</p> <p>19 Q. Have you ever heard of the term "illegal</p> <p>20 opioid"?</p> <p>21 A. No.</p> <p>22 Q. How about illicit opioid?</p> <p>23 A. No.</p> <p>24 Q. Is it your understanding that -- have you ever</p> <p>25 heard of fentanyl?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Yes.</p> <p>2 Q. Is it your understanding that fentanyl is an</p> <p>3 opioid?</p> <p>4 A. Yes.</p> <p>5 Q. Have you ever heard of heroin?</p> <p>6 A. I have.</p> <p>7 Q. Is it your understanding that heroin is an</p> <p>8 opioid?</p> <p>9 A. I'm not sure.</p> <p>10 Q. Have you ever heard of the term "diversion"</p> <p>11 used in relation to controlled substances?</p> <p>12 A. I'm going to need you to explain what you mean</p> <p>13 by used in terms of controlled substance.</p> <p>14 Q. Okay. Well, have you ever heard of the term</p> <p>15 "diversion" before?</p> <p>16 A. Yes.</p> <p>17 Q. What's your understanding of the term?</p> <p>18 A. In the term for me, diversion means that I am</p> <p>19 diverting someone from legal proceedings to a treatment</p> <p>20 program or a program that's going to provide them with</p> <p>21 education.</p> <p>22 Q. Gotcha.</p> <p>23 Have you ever heard of the term "diversion"</p> <p>24 used in relation to controlled substance like when a</p> <p>25 controlled substance is diverted?</p>	<p style="text-align: right;">Page 12</p> <p>1 (Break from 10:17 a.m. to 10:20 a.m.)</p> <p>2 THE VIDEOGRAPHER: We're back on the</p> <p>3 record at 10:20 a.m.</p> <p>4 Q. (BY MR. FORD) Okay. Ms. Bennett-Wright, I</p> <p>5 have handed you what's been marked as Exhibit 1. Do you</p> <p>6 recognize this document?</p> <p>7 A. I do.</p> <p>8 Q. Is it fair to say it's an email that includes</p> <p>9 you, an email thread that includes you?</p> <p>10 A. It is.</p> <p>11 Q. Do you remember this email thread, by chance?</p> <p>12 A. No.</p> <p>13 Q. A lot of emails.</p> <p>14 Do you see it's the third email down, and it's</p> <p>15 an email from you to Leighton Iles. Am I saying that</p> <p>16 name right?</p> <p>17 A. Yes.</p> <p>18 Q. And do you see it begins "The First Offender</p> <p>19 Drug Program"?</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. We'll talk -- I have got some questions about</p> <p>23 the First Offender Drug Program in a little bit, but it</p> <p>24 seems like you're saying what offenses make someone</p> <p>25 eligible for the program. Is that fair to say?</p>
<p style="text-align: right;">Page 11</p> <p>1 A. No.</p> <p>2 Q. Okay. I would like to introduce one exhibit</p> <p>3 that I think might help. And --</p> <p>4 MS. AYACHI: I'm sorry, Counselor, I</p> <p>5 believe you guys were going to provide me with a link to</p> <p>6 the exhibits you would be using today.</p> <p>7 MR. FORD: Yeah, we said we've got</p> <p>8 Exhibit Share, so I'm going to publish them as I go.</p> <p>9 MS. AYACHI: Got it.</p> <p>10 MR. FORD: So I will publish it right</p> <p>11 now.</p> <p>12 (Exhibit 1 marked.)</p> <p>13 Q. (BY MR. FORD) I will give you what's -- I'm</p> <p>14 passing you what will be marked Exhibit 1.</p> <p>15 MR. FORD: Bear with me as I --</p> <p>16 So I have just introduced in Exhibit Share</p> <p>17 Exhibit 1. Do you see it there, for people attending</p> <p>18 remotely?</p> <p>19 MS. AYACHI: I do not. I'm sorry, do you</p> <p>20 mind if we just go off the record? I need to get into</p> <p>21 Exhibit Share.</p> <p>22 MR. FORD: Sure.</p> <p>23 MS. AYACHI: Thank you.</p> <p>24 THE VIDEOGRAPHER: We're off the record</p> <p>25 at 10:17 a.m.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. That is correct.</p> <p>2 Q. Do you see number 10, where it says diversion</p> <p>3 of controlled substance?</p> <p>4 A. I do.</p> <p>5 Q. I'm talking about that -- that sort of</p> <p>6 diversion. Does this help you understand? I'm trying</p> <p>7 to see what you mean when you, you know, use a phrase</p> <p>8 like that in this context.</p> <p>9 A. I still don't know what it means because that</p> <p>10 is a list that was created by the District Attorney's</p> <p>11 Office.</p> <p>12 Q. Okay. So if I use the term "diversion" today,</p> <p>13 I'll be referring to a controlled substance that is</p> <p>14 taken out of the lawful chain of supply and diverted to</p> <p>15 be used for illegal means. Does that make sense to you?</p> <p>16 A. It really does not, I'm sorry.</p> <p>17 Q. Okay. What about that explanation doesn't</p> <p>18 make sense to you?</p> <p>19 A. Okay. So to determine if it was a diversion</p> <p>20 drug, that would have been something that the District</p> <p>21 Attorney's Office, they agreed to the offense to come</p> <p>22 into the program. Diversion for me would mean the</p> <p>23 program that they were put into.</p> <p>24 Q. Okay. So I'll clarify when I mean diversion</p> <p>25 of a controlled substance, but when I'll be using it --</p>

<p style="text-align: right;">Page 14</p> <p>1 and I'll make sure to clarify -- I'll mean when a 2 controlled substance is diverted or taken from a lawful 3 use and diverted into an illegal use, like being sold on 4 the black market or used by someone without a 5 prescription. Is that fair? 6 A. Yes. 7 Q. Okay. All right. You can put Exhibit 1 to 8 the side. 9 So have you had any involvement in this 10 lawsuit? 11 A. No. 12 MS. AYACHI: Objection, form. 13 Q. (BY MR. FORD) Do you know -- the lawsuit was 14 filed in 2018; is that right? Let me restate that. 15 Does it sound right to you that this lawsuit 16 was filed in 2018? 17 A. I don't know the answer to that. 18 Q. Were you involved at all in the decision to 19 bring the lawsuit? 20 A. I was not. 21 Q. Do you know whose decision it was to bring the 22 lawsuit? 23 A. I do not. 24 MS. AYACHI: Objection, form. 25 A. I do not.</p>	<p style="text-align: right;">Page 16</p> <p>1 to anyone else about your deposition here today? 2 A. No. 3 Q. In preparing for this deposition, did you 4 review any documents? 5 A. I did not. 6 Q. Did you review any emails? 7 A. I did not. 8 Q. Okay. I would like to mark Exhibit 2, and I 9 would like to talk to you a little bit about your 10 employment background and education. 11 (Exhibit 2 marked.) 12 Q. (BY MR. FORD) And let me -- so I've 13 introduced Exhibit 2 and marked it and given it to you, 14 Ms. Bennett-Wright. And I've given you what I pulled 15 in, I believe, what is your LinkedIn page. Is this, in 16 fact, your LinkedIn page? 17 A. It looks to be the page that I view, yes. 18 Q. It's a little different when we pull it and 19 print it. 20 A. Yes. 21 Q. It says underneath your name Assistant 22 Criminal Courts Administrator. Is that your current 23 position? 24 A. It is. 25 Q. And then I was wondering if you could thumb</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. (BY MR. FORD) Did you meet with any attorneys 2 before today's deposition? 3 A. Yes. 4 Q. Now I'm not going to ask you about the content 5 of your conversations with them, but which attorneys did 6 you meet before today? 7 A. Counsel for the county. 8 Q. Do you know their name? 9 A. Leila. 10 Q. Is it from Lanier -- attorneys with Lanier Law 11 Firm? 12 A. Yes. 13 Q. Did you meet with any other attorneys? 14 A. There were other attorneys present. I don't 15 remember their names. 16 Q. Do you know if they were with The Lanier Law 17 Firm as well? 18 A. One was, yes. 19 Q. Okay. Other than the attorneys you spoke -- 20 or how many times did you meet with the attorneys? 21 A. Twice. 22 Q. When were those meetings? 23 A. One was on Tuesday of last week, and one was 24 Friday of last week. 25 Q. And other than those meetings, have you talked</p>	<p style="text-align: right;">Page 17</p> <p>1 through it real quick, and let me know is there anything 2 on there that is inaccurate or wrong? 3 A. Everything looks to be correct. 4 Q. Okay. Thanks. 5 So for -- under education, it says you 6 attended TCU for a Master of Arts; is that correct? 7 A. That is correct. 8 Q. What was the Master of Arts in? Is there like 9 a specific field or something? 10 A. It's liberal arts. 11 Q. Liberal arts, okay. 12 Other than the education listed on here, did 13 you attend any other schooling? 14 A. I went to Tarrant County junior college, but 15 it would be just for a class or two. 16 Q. After your time at TCU, did you attend any 17 schooling after that? 18 A. No. 19 Q. So -- okay. Do you have any, you know, 20 professional certifications of any kind? 21 A. I do. 22 Q. What are those? 23 A. I have a certification in mediation. I also 24 have different certifications that I received associated 25 with my job. I'm not sure of all the ones that I've</p>

<p style="text-align: right;">Page 18</p> <p>1 received.</p> <p>2 Q. Mediation. Do you -- are there certain types</p> <p>3 of, you know, conflicts you would mediate?</p> <p>4 A. It's in marital disputes --</p> <p>5 Q. Okay.</p> <p>6 A. -- where children were involved.</p> <p>7 Q. So the other certifications that you mentioned</p> <p>8 more generally, do any relate to, you know, budget or</p> <p>9 finance?</p> <p>10 A. No, not to my knowledge.</p> <p>11 Q. Can you give me an example of just one of the</p> <p>12 certifications you're thinking about when you said the</p> <p>13 ones that you've gained during your time working?</p> <p>14 A. National Association of Drug Courts, I have</p> <p>15 been certified in different areas there, as far as for</p> <p>16 going through classes for substance abuse, going through</p> <p>17 classes for interviewing and interacting with</p> <p>18 participants in diversion programs.</p> <p>19 Q. Got it. Thank you.</p> <p>20 So now I would like to talk a little bit about</p> <p>21 your work history. Do you remember what your first you</p> <p>22 job was after undergrad?</p> <p>23 A. After my undergrad, I was a criminal justice</p> <p>24 analyst.</p> <p>25 Q. And was that for Tarrant County?</p>	<p style="text-align: right;">Page 20</p> <p>1 controlled substances, did you ever look at opioids</p> <p>2 specifically?</p> <p>3 A. I did not.</p> <p>4 Q. Was the analysis, you know -- I am trying to</p> <p>5 think of how to ask this. Sorry, strike that.</p> <p>6 As part of your analysis, would you ever look</p> <p>7 at whether inmates had substance abuse issues?</p> <p>8 A. No.</p> <p>9 Q. Okay. Thank you.</p> <p>10 And was your role as a criminal justice</p> <p>11 analyst, was that within the criminal courts</p> <p>12 administration?</p> <p>13 A. No.</p> <p>14 Q. What -- was that within Tarrant County?</p> <p>15 A. Yes.</p> <p>16 Q. What department or administration would the</p> <p>17 criminal justice analyst be under?</p> <p>18 A. It was under the administrator's office.</p> <p>19 Q. Okay. And after you left the role of criminal</p> <p>20 justice analyst, what did you do next?</p> <p>21 A. As criminal justice analyst, the title did not</p> <p>22 move, but the position moved. So the position moved to</p> <p>23 criminal courts, and it was -- in that position I</p> <p>24 continued to do analyses for the judges, as well as to</p> <p>25 manage grants.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Yes.</p> <p>2 Q. And I think in your -- is your -- your</p> <p>3 LinkedIn is accurate, that you would have started that</p> <p>4 job in November of 1994?</p> <p>5 A. Yes.</p> <p>6 Q. So what is the job of criminal justice</p> <p>7 analyst?</p> <p>8 A. As a criminal justice analyst, it was my</p> <p>9 responsibility to look at criminal trends within Tarrant</p> <p>10 County and provide statistics.</p> <p>11 Q. What kind of trends would you look at?</p> <p>12 A. It would be based on jail population to see</p> <p>13 what kind of cases were coming into the jails and where</p> <p>14 there was a rise or a fall in different areas.</p> <p>15 Q. Would that include, you know, looking at</p> <p>16 charges related to controlled substances?</p> <p>17 A. Yes.</p> <p>18 Q. So you would analyze trends relating to crimes</p> <p>19 related to controlled substances?</p> <p>20 A. Yes.</p> <p>21 Q. So that would be, for example, you know,</p> <p>22 someone that's in jail for possession of a controlled</p> <p>23 substance?</p> <p>24 A. Yes.</p> <p>25 Q. Did you ever look at -- when you analyzed</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. So if I understand you right, it was</p> <p>2 originally in the administrative department?</p> <p>3 A. It was in the administrator's office, and then</p> <p>4 it moved to criminal courts administration.</p> <p>5 Q. Do you remember when that move would have</p> <p>6 happened?</p> <p>7 A. I do not.</p> <p>8 Q. Did you eventually leave your role as criminal</p> <p>9 justice analyst?</p> <p>10 A. I did not.</p> <p>11 Q. So you're still a criminal justice analyst</p> <p>12 today?</p> <p>13 A. No.</p> <p>14 Q. So that's what I'm trying to get at. So when</p> <p>15 did you take a different job title?</p> <p>16 A. The position -- I was promoted to the</p> <p>17 assistant criminal courts administrator.</p> <p>18 Q. Oh, okay. Got it.</p> <p>19 And I think you have that on your LinkedIn.</p> <p>20 Was this time right, that happened October 2014?</p> <p>21 A. It was -- yes.</p> <p>22 Q. Okay. And what are your job duties as</p> <p>23 assistant criminal courts administrator?</p> <p>24 A. I maintain the budgets for 21 different -- for</p> <p>25 the 21 criminal courts and seven courts under the</p>

<p style="text-align: right;">Page 22</p> <p>1 criminal courts administration. I am the administrator 2 for the specialty courts and special programs. I'm also 3 the liaison for HR issues between the courts and the HR 4 department. 5 Q. Okay. That's broadly -- that covers it, the 6 extent of your duties? 7 A. Yes. 8 Q. It sounds like a lot. 9 A. And grant writing. 10 Q. And grant writing? 11 A. Yes. 12 Q. Is the grant writing for all the courts that 13 you touch? 14 A. No. 15 Q. No. 16 What courts do you do grant writing for? 17 A. It's only for the specialty courts. 18 Q. Gotcha. 19 So for -- you mentioned maintaining budgets 20 for the criminal courts; is that right? 21 A. Correct. 22 Q. Can you explain to me a little bit what that 23 job entails? 24 A. So each year we're required to have a budget. 25 The budget is set for the courts. I go through and make</p>	<p style="text-align: right;">Page 24</p> <p>1 testimony was that when departments submit proposed 2 budgets, they include justifications for, you know, the 3 line items that they want funded. Would you agree with 4 that general statement? 5 A. Yes. 6 MS. AYACHI: Objection, form. 7 Q. (BY MR. FORD) Why do you include -- do you 8 include justifications when you submit your proposed 9 budget? 10 A. Yes. 11 Q. Why do you include justifications? 12 A. It's required by the budget office. 13 Q. Do you ever remember an instance -- well, 14 yeah, do you ever remember an instance where the budget 15 department, you know, said that you needed to submit a 16 more complete justification in order to get funding? 17 A. No. 18 Q. Do you try to be, you know, as descriptive as 19 possible when you put justifications in? 20 A. I do. 21 MS. AYACHI: Objection, form. 22 Q. (BY MR. FORD) And why do you try to be as 23 descriptive as possible? 24 A. To save the budget office time. 25 Q. Okay. Now I want to switch gears a little bit</p>
<p style="text-align: right;">Page 23</p> <p>1 sure that the line items are all covered to make sure 2 the courts expenses are able to be taken care of, make 3 sure that everything that's in there, as far as for 4 education, supplies and any additional needs they may 5 have, such as competency evaluations. There may be an 6 increase in the cost of competency evaluations from the 7 year before. 8 Q. Okay. And so in your role, are you in charge 9 of preparing the proposed budget for the -- sorry, back 10 up. 11 For criminal courts administration, do you 12 ever refer to it as CCA or -- 13 A. I do. 14 Q. -- or shorthand? 15 A. CCA. 16 Q. Save some words. 17 So are you responsible for preparing the 18 proposed budget for the CCA each year? 19 A. I am. 20 Q. And that gets submitted using software to the 21 budget and risk management department; is that right? 22 A. That is correct. 23 Q. So, you know, we've done depositions in this 24 case of people with the budget and risk management 25 department, like Helen Giese. And, you know, her</p>	<p style="text-align: right;">Page 25</p> <p>1 to specifically your experience with Albertsons and 2 Kroger, the two defendants that are represented here 3 today. 4 As I said, I represent Albertsons, and I was 5 wondering have you ever shopped at an Albertsons before? 6 A. I have. 7 Q. Have you ever shopped at a Randall's Food and 8 Drug? 9 A. Yes. 10 Q. How about United Supermarkets, have you ever 11 shopped at a United Supermarkets? 12 A. Not to my knowledge. 13 Q. How about Safeway, have you ever shopped at a 14 Safeway? 15 A. Yes. 16 Q. Okay. So for an Albertsons -- your experience 17 at Albertsons, Randall's Food and Drug or Safeway, can 18 you remember any bad experiences you've had shopping 19 there at those places? 20 A. No. 21 Q. Do you remember if, you know, shopping at 22 those locations included using their pharmacies? 23 A. I don't remember. 24 Q. Okay. Now I'm going to ask the same questions 25 about Kroger.</p>

<p style="text-align: right;">Page 26</p> <p>1 Have you ever shopped at a Kroger before?</p> <p>2 A. I have.</p> <p>3 Q. Would you say that you've had any bad</p> <p>4 experiences at Kroger?</p> <p>5 A. No.</p> <p>6 Q. And do you remember if when you shopped there</p> <p>7 it included using their pharmacy?</p> <p>8 A. It did.</p> <p>9 Q. Okay. Thank you.</p> <p>10 So, you know, we've talked a little bit about</p> <p>11 what opioids are. I just wanted to be clear. Are you</p> <p>12 licensed to prescribe opioids?</p> <p>13 A. No.</p> <p>14 Q. Are you licensed to dispense opioids?</p> <p>15 A. No.</p> <p>16 Q. Do you have any training or education relating</p> <p>17 to how to properly prescribe opioids?</p> <p>18 A. No.</p> <p>19 Q. Are you aware generally that a healthcare</p> <p>20 provider licensed by the DEA can write a prescription</p> <p>21 for opioids?</p> <p>22 A. Yes.</p> <p>23 Q. Do you believe that prescription opioids can</p> <p>24 provide a medical benefit when prescribed to patients</p> <p>25 for legitimate medical reasons?</p>	<p style="text-align: right;">Page 28</p> <p>1 Tarrant County rises to the level of a crisis?</p> <p>2 A. No.</p> <p>3 MS. AYACHI: Objection, form.</p> <p>4 A. No.</p> <p>5 Q. (BY MR. FORD) How about methamphetamine,</p> <p>6 would you say that there's a methamphetamine abuse</p> <p>7 problem in Tarrant County?</p> <p>8 A. Yes.</p> <p>9 Q. Would you say that the methamphetamine abuse</p> <p>10 problem rises to the level of a crisis?</p> <p>11 A. Yes.</p> <p>12 MS. AYACHI: Objection, form.</p> <p>13 Q. (BY MR. FORD) How about marijuana, do you</p> <p>14 think there's a marijuana abuse problem in Tarrant</p> <p>15 County?</p> <p>16 A. I'm not sure.</p> <p>17 Q. How about cocaine, is there a cocaine abuse</p> <p>18 problem in Tarrant County?</p> <p>19 A. Abuse, yes.</p> <p>20 Q. Would that rise to the level of crisis?</p> <p>21 MS. AYACHI: Objection, form.</p> <p>22 A. I'm not sure.</p> <p>23 Q. (BY MR. FORD) And opioids, do you think</p> <p>24 there's an opioid abuse problem in Tarrant County?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 27</p> <p>1 MS. AYACHI: Objection, form.</p> <p>2 Q. (BY MR. FORD) You can answer.</p> <p>3 A. I'm not sure.</p> <p>4 Q. Why aren't you sure?</p> <p>5 A. I wasn't sure what all you said.</p> <p>6 Q. I'll repeat the question.</p> <p>7 Do you believe that, you know, prescription</p> <p>8 opioids can provide a medical benefit when they're</p> <p>9 prescribed to patients for legitimate medical reasons?</p> <p>10 A. Yes.</p> <p>11 MS. AYACHI: Objection, form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. FORD) Thank you.</p> <p>14 Do you believe that there's a substance abuse</p> <p>15 problem in Tarrant County?</p> <p>16 A. I'm not -- I don't know.</p> <p>17 Q. Do you believe -- do you believe there's an</p> <p>18 alcohol abuse problem in Tarrant County?</p> <p>19 A. Can you define problem?</p> <p>20 Q. I was wondering if, you know, your</p> <p>21 understanding how you understand that question, if you</p> <p>22 would say there is an alcohol abuse problem in Tarrant</p> <p>23 County?</p> <p>24 A. Yes.</p> <p>25 Q. Do you think that the alcohol abuse problem in</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. In your opinion, does the opioid abuse problem</p> <p>2 involve both prescription opioids and illegal opioids?</p> <p>3 A. Yes.</p> <p>4 Q. Do you think there's a problem with</p> <p>5 specifically prescription opioid abuse in Tarrant</p> <p>6 County?</p> <p>7 A. I'm not sure.</p> <p>8 Q. Do you think the opioid abuse problem in</p> <p>9 Tarrant County rises to the level of a crisis?</p> <p>10 MS. AYACHI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. FORD) So we talked about, you know,</p> <p>13 the phrase "opioid epidemic." Would you also describe</p> <p>14 the opioid abuse problem in Tarrant County as an opioid</p> <p>15 epidemic?</p> <p>16 A. I'm not sure.</p> <p>17 Q. Have you ever heard of the term "opioid use</p> <p>18 disorder"?</p> <p>19 A. No.</p> <p>20 Q. Or OUD?</p> <p>21 A. Yes.</p> <p>22 Q. What does OUD mean to you? I ask you because</p> <p>23 I might, you know, use the term later on, so wondering</p> <p>24 if we'll be talking about the same thing.</p> <p>25 A. It would -- may have just been something that</p>

<p style="text-align: right;">Page 30</p> <p>1 was mentioned in a training.</p> <p>2 Q. Do you understand that to be like an opioid</p> <p>3 use problem that an individual would have?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know what the OUD rate in Tarrant</p> <p>6 County is?</p> <p>7 A. I do not.</p> <p>8 Q. Have you yourself ever personally been</p> <p>9 prescribed opioids?</p> <p>10 MS. AYACHI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. FORD) You personally?</p> <p>13 MS. AYACHI: Objection. This is HIPAA</p> <p>14 protected information. She doesn't have to answer</p> <p>15 personal prescriptions she's received.</p> <p>16 MR. FORD: It's a little hard to hear</p> <p>17 you. What did you say?</p> <p>18 MS. AYACHI: I said objection on the</p> <p>19 grounds it's HIPAA protected. She doesn't need to</p> <p>20 reveal anything about any sort of medical reason why she</p> <p>21 might have been prescribed prescription opioids.</p> <p>22 MR. FORD: Are you directing her not to</p> <p>23 answer?</p> <p>24 MS. AYACHI: I am inviting her not to</p> <p>25 answer if she does not wish to.</p>	<p style="text-align: right;">Page 32</p> <p>1 of the CCA?</p> <p>2 A. Yes.</p> <p>3 Q. I saw on -- I wanted to save some paper so I</p> <p>4 didn't print out the website, but I saw on your website,</p> <p>5 you know, a description of the CCA on Tarrant County's</p> <p>6 website, saying that the CCA, you know, has -- there's a</p> <p>7 criminal courts administrator; is that correct?</p> <p>8 A. Correct.</p> <p>9 Q. And what is his or her name?</p> <p>10 A. Greg Shugart.</p> <p>11 Q. And how long has Mr. Shugart been in that</p> <p>12 role?</p> <p>13 A. I think 13 years.</p> <p>14 Q. During your time have there been other</p> <p>15 criminal courts administrators?</p> <p>16 A. Yes.</p> <p>17 Q. Who was before Mr. Shugart?</p> <p>18 A. Clete McAlister.</p> <p>19 Q. And on your website it says -- or on Tarrant</p> <p>20 County's CCA website, it says that the administrator,</p> <p>21 quote, serves as the chief of staff for several judicial</p> <p>22 support departments.</p> <p>23 Do you agree with that statement?</p> <p>24 A. Yes.</p> <p>25 Q. I was just wondering the phrase "chief of</p>
<p style="text-align: right;">Page 31</p> <p>1 MR. FORD: Inviting her not to answer? I</p> <p>2 am just trying to get clear on your objection, just</p> <p>3 respectfully, because, you know, I've heard this come up</p> <p>4 before. And I'm, you know, a little confused on what</p> <p>5 provisions of HIPAA would prevent me from asking the</p> <p>6 question, so --</p> <p>7 MS. AYACHI: Ms. Bennett-Wright, if you</p> <p>8 feel comfortable to answer this question, you can answer</p> <p>9 the question.</p> <p>10 A. Yes.</p> <p>11 Q. (BY MR. FORD) Did you have any issues or</p> <p>12 problems, you know, with the opioids that you were</p> <p>13 prescribed using -- to use?</p> <p>14 A. No.</p> <p>15 Q. Thank you.</p> <p>16 Now I want to switch gears back to the CCA.</p> <p>17 Can you describe to me generally what the CCA is?</p> <p>18 A. Criminal courts administration, CCA for short,</p> <p>19 is responsible for taking care of the administrative</p> <p>20 needs of the criminal courts.</p> <p>21 Q. And so would that sort of include when you</p> <p>22 were describing your job duties, would the CCA play</p> <p>23 those roles of maintaining the budgets for the criminal</p> <p>24 courts and also administering specialty courts and</p> <p>25 everything else you mentioned? Is that sort of the role</p>	<p style="text-align: right;">Page 33</p> <p>1 staff," can you sort of describe, you know, what that</p> <p>2 means?</p> <p>3 A. Chief of staff means that we're responsible</p> <p>4 for time sheets. We're responsible for FMLA, overtime,</p> <p>5 vacation time, schedules, making sure that payroll is</p> <p>6 accurate for each employee involved in the department.</p> <p>7 Q. And the criminal courts administrator, is that</p> <p>8 an appointed position?</p> <p>9 A. No.</p> <p>10 Q. How does -- how did Mr. Shugart get the job?</p> <p>11 A. He was hired.</p> <p>12 MS. AYACHI: Objection, form.</p> <p>13 Q. (BY MR. FORD) Who was he hired by?</p> <p>14 A. The criminal court judges.</p> <p>15 Q. Okay. And that's separate from the</p> <p>16 commissioner court?</p> <p>17 A. That is correct.</p> <p>18 Q. Okay. You know, being from out of town, my</p> <p>19 referring to the commissioners court as judges threw me</p> <p>20 off, so I'm a little confused by that.</p> <p>21 Do you know is Mr. Shugart hired for, you</p> <p>22 know, any set period of time?</p> <p>23 A. No.</p> <p>24 Q. And who does Mr. Shugart report to?</p> <p>25 A. The 21 criminal court judges.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. Does he have any duty to report to the 2 commissioners court? 3 A. Define report. 4 Q. I guess I'll ask two questions. If the 5 commissioners court wants Mr. Shugart to do something, 6 can they, you know, order him to do something? 7 A. They cannot. 8 Q. Does Mr. Shugart, you know, on behalf of the 9 CCA ever provide, you know, information about CCA 10 operations to the commissioners court? 11 A. He does. 12 MS. AYACHI: Objection, form. 13 Q. (BY MR. FORD) I think you mentioned the term 14 "specialty courts." 15 A. Yes. 16 Q. I was wondering, you know, could you define 17 what you mean by specialty courts? 18 A. A specialty court is usually a program that is 19 supervised by a criminal court judge, and it's also a 20 court that is tied -- it's linked to treatment versus 21 the regular criminal justice pathway. 22 Q. So are specialty courts required by Texas 23 statute? 24 A. Some of them are. 25 Q. Does Tarrant County have any specialty courts</p>	<p style="text-align: right;">Page 36</p> <p>1 the specialty courts that Tarrant County has? 2 A. The D.I.R.E.C.T. Program, which is supervised 3 by probation. 4 The Veterans Treatment Court. 5 The Public Safety Employees Treatment Court. 6 And the Mental Health Diversion Court. 7 Q. When was the Public Safety Employee Treatment 8 Court established, do you know? 9 A. About three years ago. 10 Q. It's pretty recent? 11 A. Yes. 12 Q. I've seen, you know, in the documents -- well, 13 I have a couple of questions about the D.I.R.E.C.T. 14 Program. You said that it's supervised by parole; is 15 that right? 16 A. Probation. 17 Q. Probation, sorry. 18 A. Community supervision, to be correct. 19 Q. Community Supervision and Corrections 20 department? 21 A. Yes. 22 Q. So does the CCA, you know, administer that 23 program? I was a little confused as to what the -- you 24 know, who governs the D.I.R.E.C.T. Program. 25 A. Currently CSCD.</p>
<p style="text-align: right;">Page 35</p> <p>1 that are not required by statute? 2 A. Yes. 3 Q. I feel like -- not "feel like." I've seen in, 4 you know, some documents a reference specialty programs. 5 I was wondering, are specialty programs, is that kind of 6 interchangeable with specialty courts or are they 7 different? 8 A. I would say it's different. 9 Q. That was a bad question on my part, but I was 10 wondering can you explain to me what the differences 11 would be between a specialty program and a specialty 12 court? 13 A. A specialty court is a nationally recognized 14 program. A specialty program may not be a program that 15 is required by the state, nor is it recognized by a 16 national program. 17 Q. So do you have any specialty courts that are 18 not required by statute? 19 A. No. 20 Q. So anything that's not required by statute, 21 would you -- would it be fair to refer to that as a 22 specialty program? 23 A. Yes. 24 Q. I know this is -- this might be a memory test, 25 but do you mind listing, to the best of your ability,</p>	<p style="text-align: right;">Page 37</p> <p>1 MS. AYACHI: Objection, form. 2 A. CSCD. 3 Q. (BY MR. FORD) So what role does the CCA play 4 in the D.I.R.E.C.T. Program? 5 A. None. 6 Q. And how long has that been the case? 7 A. I'd say about ten years. 8 Q. Okay. And then I saw, you know, on the 9 website in documents some names of other programs. I 10 was wondering if I could list them off and just ask you 11 what they are technically. 12 So the Felony Alcohol Intervention Program, do 13 you know what that is? 14 A. Yes. 15 Q. Is that a specialty program? 16 A. Yes. 17 Q. Is that administered by the CCA? 18 A. It is not. 19 Q. Who does that? 20 A. CSCD. 21 Q. How about -- do you understand when I use the 22 acronym RISE? 23 A. Yes. 24 Q. Is that a specialty program? 25 A. It is.</p>

<p style="text-align: right;">Page 38</p> <p>1 Q. Is that administered by the CCA?</p> <p>2 A. No.</p> <p>3 Q. Is it administered by CSCD?</p> <p>4 A. Yes.</p> <p>5 Q. How about the Youth Offender Divisional</p> <p>6 Alternative, do you know what that is?</p> <p>7 A. YODA.</p> <p>8 Q. YODA?</p> <p>9 A. Yes.</p> <p>10 Q. Is there someone that's a Star Wars fan?</p> <p>11 A. I think the judge was.</p> <p>12 Q. I noticed that. I am too.</p> <p>13 So the Youth Offender Diversion Alternative,</p> <p>14 is that a specialty program?</p> <p>15 A. Yes.</p> <p>16 Q. And does -- who administers that?</p> <p>17 A. CCA.</p> <p>18 Q. How about the Domestic Violence Diversion</p> <p>19 Program, is that a specialty program?</p> <p>20 A. Yes.</p> <p>21 Q. Who administers that?</p> <p>22 A. CCA.</p> <p>23 Q. And the First Offender Drug Program, would</p> <p>24 that be a specialty program?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 40</p> <p>1 Nonfamily exist?</p> <p>2 A. No.</p> <p>3 Q. When did -- were those distinct programs?</p> <p>4 A. The distinction between those and the YODA</p> <p>5 program was they were -- they could have been</p> <p>6 nonintimate partners.</p> <p>7 Q. Got it.</p> <p>8 Do you know when the OBI or OBI 1 program</p> <p>9 ended?</p> <p>10 A. About two years ago.</p> <p>11 Q. Do you know why?</p> <p>12 A. They stopped receiving referrals in the</p> <p>13 program.</p> <p>14 Q. Got it.</p> <p>15 So we, you know, just went through specialty</p> <p>16 courts and specialty programs, and there was a number</p> <p>17 that are administered by CSCD. And I can go through</p> <p>18 them if you want, but I was wondering for the ones that</p> <p>19 are administered by CSCD, does CCA play any role in</p> <p>20 those programs?</p> <p>21 A. No.</p> <p>22 Q. Okay. Does CCA administer or participate in</p> <p>23 any programs that are aimed specifically at addressing</p> <p>24 opioid abuse?</p> <p>25 A. Specifically, no.</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. So it's not a specialty court?</p> <p>2 A. Correct.</p> <p>3 Q. And that's administered by the CCA?</p> <p>4 A. Correct.</p> <p>5 Q. And you said the Mental Health Diversion</p> <p>6 Program is administered by the CCA?</p> <p>7 A. Yes.</p> <p>8 Q. And that is a specialty court?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And I just have a few more.</p> <p>11 The Substance Abuse Felony Punishment Facility</p> <p>12 Re-Entry Court, do you know what that is?</p> <p>13 A. Yes.</p> <p>14 Q. Is that a drug court?</p> <p>15 A. No.</p> <p>16 Q. Is that a specialty program?</p> <p>17 A. It's a CSCD program.</p> <p>18 Q. Okay. Does CCA have any role in that?</p> <p>19 A. No.</p> <p>20 Q. I listed YODA twice.</p> <p>21 This is the other Star Wars one, Other</p> <p>22 Behavior Intervention Program, have you heard of that?</p> <p>23 A. Yes. It no longer exists.</p> <p>24 Q. No longer exists.</p> <p>25 Does Other Behavior Intervention Assault</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Does the CCA administer any programs that are</p> <p>2 aimed specifically at addressing substance abuse more</p> <p>3 generally?</p> <p>4 A. Yes.</p> <p>5 Q. What would those programs be?</p> <p>6 A. The Veterans Court, the Public Safety</p> <p>7 Treatment Program, the Mental Health Court Program and</p> <p>8 FODP.</p> <p>9 Q. What is the Public Safety Treatment Program?</p> <p>10 A. The Public Safety Employees Treatment</p> <p>11 Program --</p> <p>12 Q. Oh, sorry. I didn't mean to cut you off.</p> <p>13 A. The Public Safety Employees Treatment Program</p> <p>14 is a program that is dedicated to public service</p> <p>15 workers.</p> <p>16 Q. Got it.</p> <p>17 So in what ways are these programs aimed at</p> <p>18 addressing substance abuse?</p> <p>19 A. At the --</p> <p>20 MS. AYACHI: Objection, form.</p> <p>21 Q. (BY MR. FORD) You know, can you answer on a</p> <p>22 general level?</p> <p>23 A. Based on the assessment when they come into</p> <p>24 the program, we follow the assessment if there's any</p> <p>25 information that says that they may need to go to</p>

<p style="text-align: right;">Page 42</p> <p>1 treatment.</p> <p>2 Q. So for the programs you mentioned -- actually,</p> <p>3 you know, strike that.</p> <p>4 I want to ask a slightly different question,</p> <p>5 which is do you believe the CCA administers any programs</p> <p>6 that have been impacted by opioid abuse in Tarrant</p> <p>7 County?</p> <p>8 MS. AYACHI: Objection, form.</p> <p>9 A. I didn't understand your question.</p> <p>10 Q. (BY MR. FORD) So I just asked you if there</p> <p>11 was any programs that are aimed specifically at opioid</p> <p>12 abuse, and you answered no, not specifically.</p> <p>13 I was wondering -- I was trying to get at, you</p> <p>14 know, whether the issue of opioid abuse in Tarrant</p> <p>15 County, if that's had impact on any of the programs</p> <p>16 we've been talking about?</p> <p>17 MS. AYACHI: Objection, form.</p> <p>18 Q. (BY MR. FORD) Specifically the Veterans</p> <p>19 Court, the Public Safety Employees Program, Mental</p> <p>20 Health Program or the FODP.</p> <p>21 A. I'm not sure.</p> <p>22 Q. So I just wanted to take a little bit of time</p> <p>23 to talk about -- a little bit more about the Veterans</p> <p>24 Treatment Court and then the Mental Health Diversion</p> <p>25 Program, the FODP and D.I.R.E.C.T., those four programs.</p>	<p style="text-align: right;">Page 44</p> <p>1 phrased it, does that not include substance abuse</p> <p>2 issues?</p> <p>3 A. It could be a traumatic brain injury.</p> <p>4 Q. Got it.</p> <p>5 And can you explain to me how the Veterans</p> <p>6 Treatment Court is funded?</p> <p>7 A. Veterans Court is funded through Texas</p> <p>8 Veterans Commission, the Office of the Governor through</p> <p>9 the State of Texas, and also through general funds from</p> <p>10 the county.</p> <p>11 Q. Do you know what portion of funds come from</p> <p>12 Tarrant County?</p> <p>13 A. Not without looking at my information, sorry.</p> <p>14 Q. Oh, no.</p> <p>15 What -- you know, what information would you</p> <p>16 look at to figure out the answer?</p> <p>17 A. I would have to look at my budgets.</p> <p>18 Q. So would the annual budget be the place you</p> <p>19 would look?</p> <p>20 A. No.</p> <p>21 Q. What sort of document would you look at?</p> <p>22 A. I would actually look at my annual expenses</p> <p>23 and look at what it costs us to run the program and what</p> <p>24 was spent on where.</p> <p>25 Q. Is that report, does that make -- does that --</p>
<p style="text-align: right;">Page 43</p> <p>1 I am happy to get into it now. We've been going for a</p> <p>2 little bit. Are you fine to keep going or would you</p> <p>3 like a break?</p> <p>4 A. I'm fine.</p> <p>5 Q. Okay. So now I would like to talk about the</p> <p>6 Veterans Treatment Court. I think it's in the name, but</p> <p>7 can you describe a little bit who is served by the</p> <p>8 Veterans Treatment Court?</p> <p>9 A. Veterans. It's 100 percent for veterans.</p> <p>10 Q. Is that, you know, US military veterans, or is</p> <p>11 it broader than that?</p> <p>12 A. It's US military.</p> <p>13 Q. And generally speaking, can you describe what</p> <p>14 services the Veterans Treatment Court provides?</p> <p>15 A. The services they provide -- because it is a</p> <p>16 treatment court, once a person is put into the program,</p> <p>17 there's an assessment that is done to determine what</p> <p>18 their needs are. If their needs are substance abuse, we</p> <p>19 have to go at substance abuse first. If there are</p> <p>20 medical needs, we get in touch with the VA to take care</p> <p>21 of their medical needs. If it's housing, we look at</p> <p>22 different agencies that can help them with housing. We</p> <p>23 look at providing them with educational needs and</p> <p>24 employment.</p> <p>25 Q. When you say medical needs, the way you</p>	<p style="text-align: right;">Page 45</p> <p>1 did those expenditures make its way into the Tarrant</p> <p>2 County budget anywhere --</p> <p>3 A. No.</p> <p>4 Q. -- to get reported?</p> <p>5 Does the amount of funds that Tarrant County</p> <p>6 spends specifically change year to year?</p> <p>7 A. Yes.</p> <p>8 Q. And why is that?</p> <p>9 A. Salaries.</p> <p>10 Q. What are Tarrant County funds used for for the</p> <p>11 Veteran Treatment Court?</p> <p>12 A. For salaries for the staff.</p> <p>13 Q. Do they pay for anything else?</p> <p>14 A. No.</p> <p>15 Q. Are salaries ever covered by other sources,</p> <p>16 like grant money?</p> <p>17 A. Some of the people in the program are paid by</p> <p>18 salary and some are paid by grant funds.</p> <p>19 Q. Do you know how many people are on salary in</p> <p>20 the Veteran Treatment Court?</p> <p>21 A. Two.</p> <p>22 Q. Currently, do you know if Tarrant County is</p> <p>23 paying their salary?</p> <p>24 A. Yes.</p> <p>25 Q. In addition to their work on Veteran Treatment</p>

<p style="text-align: right;">Page 46</p> <p>1 Court, do those two staff members do anything else?</p> <p>2 A. They also work with Public Safety Employees</p> <p>3 Treatment Court.</p> <p>4 Q. Is there ever a situation where funds expended</p> <p>5 by Tarrant County are, you know, later reimbursed by a</p> <p>6 grant?</p> <p>7 A. All of our grants are reimbursement grants.</p> <p>8 So when we are expensing items, such as the treatment</p> <p>9 that we're paying for to providers, Tarrant County first</p> <p>10 pays the expense. After the invoices have come in,</p> <p>11 Tarrant County takes care of the invoice. We then have</p> <p>12 to wait for the commissioners court to write the checks,</p> <p>13 sign the checks. The vendor cashes the checks. The</p> <p>14 checks go back through the bank. And then we can ask</p> <p>15 for reimbursement from the grants.</p> <p>16 Q. Okay. And that's how every grant you have</p> <p>17 operates --</p> <p>18 A. Yes.</p> <p>19 Q. -- that process?</p> <p>20 A. Yes.</p> <p>21 Q. I want to show you a couple, two documents,</p> <p>22 that I had questions about.</p> <p>23 MR. FORD: I would like to introduce --</p> <p>24 what are we on, 3?</p> <p>25 THE REPORTER: Yes.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes, from 2012.</p> <p>2 Q. From 2012.</p> <p>3 And I just had a couple questions on the</p> <p>4 fiscal impact section. Do you see that at the bottom?</p> <p>5 A. Yes.</p> <p>6 Q. Do you see county -- the language "county</p> <p>7 funds utilized for interim funding will be reimbursed by</p> <p>8 these grants"?</p> <p>9 A. Yes.</p> <p>10 Q. So I've seen some -- well, let me back up.</p> <p>11 Does a document like this need to be submitted</p> <p>12 to the commissioners court before grant funding can be</p> <p>13 accepted?</p> <p>14 A. No. Do you want me to explain why?</p> <p>15 Q. Yes, please.</p> <p>16 A. Interim funding means that the grant has not</p> <p>17 been approved by the time that the grant ended. So if</p> <p>18 we had a grant in 2011 -- 2011, the grant would have</p> <p>19 expired, but the 2012 grant had not come in. We had a</p> <p>20 preliminary approval from the state, but it had not</p> <p>21 funded; and until those funds actually come into the</p> <p>22 county, we cannot use them. We cannot expense against</p> <p>23 them. So the county will provide interim funding, which</p> <p>24 is -- this is for 60 days, meaning that they would pay</p> <p>25 the salaries of our employees and any treatment dollars</p>
<p style="text-align: right;">Page 47</p> <p>1 MR. FORD: Exhibit 3.</p> <p>2 (Exhibit 3 marked.)</p> <p>3 Q. (BY MR. FORD) Ms. Bennett-Wright, I am going</p> <p>4 to pass you this document.</p> <p>5 A. Yes.</p> <p>6 Q. And then bear with me as I -- actually, can I</p> <p>7 get that back?</p> <p>8 A. Sorry.</p> <p>9 Q. I gave you my highlighted copy. Sorry about</p> <p>10 that.</p> <p>11 MR. FORD: There you go. And I'm</p> <p>12 introducing the exhibit now. I am going to publish it.</p> <p>13 I published what's been marked as Exhibit 3.</p> <p>14 Q. (BY MR. FORD) Ms. Bennett-Wright, do you</p> <p>15 recognize this email as coming from you?</p> <p>16 A. As coming from me, yes.</p> <p>17 Q. And there's an attachment to this email which</p> <p>18 is on the backside. Do you recognize what this type of</p> <p>19 document is?</p> <p>20 A. Yes.</p> <p>21 Q. How would you describe what this is?</p> <p>22 A. It's a court communication for commissioners</p> <p>23 court.</p> <p>24 Q. Okay. And does this cover a few different</p> <p>25 specialty courts?</p>	<p style="text-align: right;">Page 49</p> <p>1 for the 60 days.</p> <p>2 Q. And the idea would be once the grant money was</p> <p>3 secured, then it would be -- then the county would be</p> <p>4 reimbursed for the funds it spent?</p> <p>5 A. Yes, if it was in the line items of the grant.</p> <p>6 Q. Okay. So do you see it's the background</p> <p>7 section, paragraph two? I am going to read. The</p> <p>8 diversion programs are presently funded by the</p> <p>9 Governor's Criminal Justice Diversion.</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. I was wondering, does that mean that the --</p> <p>13 these programs are completely funded by the --</p> <p>14 A. No.</p> <p>15 Q. No?</p> <p>16 Would -- back then would Tarrant County still</p> <p>17 pay for, say, salaries or --</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Maybe I can save an exhibit. I've seen</p> <p>20 documents like this where under the fiscal impact it</p> <p>21 says there is no fiscal impact to Tarrant County. Are</p> <p>22 you familiar with that kind of language that would be in</p> <p>23 a document like this?</p> <p>24 A. Yes.</p> <p>25 Q. When that language is used, what does that</p>

<p style="text-align: right;">Page 50</p> <p>1 mean?</p> <p>2 A. It means that no funds -- the county will not</p> <p>3 have to cover any of the costs such as the line items in</p> <p>4 that grant.</p> <p>5 Q. But there's still the process where the county</p> <p>6 technically pays for it first and then is reimbursed?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. You can set that to the side. I am</p> <p>9 finished with that.</p> <p>10 I would like to show you another exhibit that</p> <p>11 talks a little bit about Veterans Treatment Court. I am</p> <p>12 going to mark this as Exhibit 4.</p> <p>13 (Exhibit 4 marked.)</p> <p>14 Q. (BY MR. FORD) Here you go.</p> <p>15 MR. FORD: And I will introduce it now.</p> <p>16 Bear with me for a second. I have introduced on Exhibit</p> <p>17 Share Exhibit 4.</p> <p>18 Q. (BY MR. FORD) Ms. Bennett-Wright, I just had</p> <p>19 a couple of questions about the attachment to this, but</p> <p>20 do you remember receiving this email?</p> <p>21 A. No.</p> <p>22 Q. Do you have any -- looking at, you know, who</p> <p>23 it's from, and it looks like you're cc'd, right?</p> <p>24 A. Correct.</p> <p>25 Q. And this contains a number of some</p>	<p style="text-align: right;">Page 52</p> <p>1 A. Yes.</p> <p>2 Q. Does that sound right to you, that the Veteran</p> <p>3 Treatment Court has been around since 2010?</p> <p>4 A. Yes.</p> <p>5 Q. If you turn to page 4, do you see the section</p> <p>6 named C, Methods For Achieving Goals?</p> <p>7 A. Yes.</p> <p>8 Q. And under Goal 1, it's called reduce drug use</p> <p>9 and related criminal activity.</p> <p>10 Do you see that label?</p> <p>11 A. Yes.</p> <p>12 Q. So that first bullet, only bullet says,</p> <p>13 Mandate intensive substance abuse treatment and close</p> <p>14 judicial supervision and mentoring of all participants.</p> <p>15 Do you see that language?</p> <p>16 A. Yes.</p> <p>17 Q. Do you know what is entailed in the intensive</p> <p>18 substance abuse treatment that's provided by the</p> <p>19 Veterans Treatment Court?</p> <p>20 A. It would be the amount of drug testing, as</p> <p>21 well as they would be required to go to an education</p> <p>22 program; and they would also, if their assessment said</p> <p>23 that they needed treatment, they would go to a substance</p> <p>24 abuse treatment program.</p> <p>25 Q. Okay. Do you know -- well, strike that.</p>
<p style="text-align: right;">Page 51</p> <p>1 attachments. I have included one in the exhibit, which</p> <p>2 is the Veterans Treatment Court Policy and Procedure</p> <p>3 Manual.</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Are you familiar with this document?</p> <p>7 A. Vaguely.</p> <p>8 Q. Okay. I had a couple questions about it. The</p> <p>9 first is, if you turn to page 3, and do you see in the</p> <p>10 first paragraph under introduction and overview it says,</p> <p>11 A "drug court" and then goes on?</p> <p>12 A. Yes.</p> <p>13 Q. I can't remember if you answered this. Is the</p> <p>14 Veterans Treatment Court referred to as a drug court?</p> <p>15 A. Yes.</p> <p>16 Q. So is the term a "specialty court" and a "drug</p> <p>17 court" interchangeable?</p> <p>18 A. Yes.</p> <p>19 Q. And a little bit further down the page in the</p> <p>20 paragraph, third paragraph starting "In 2009," do you</p> <p>21 see that?</p> <p>22 A. Yes.</p> <p>23 Q. The second sentence says, On, January 1, 2010,</p> <p>24 Tarrant County created the Tarrant County Veterans Court</p> <p>25 Diversion Program.</p>	<p style="text-align: right;">Page 53</p> <p>1 Do you know who would provide those services</p> <p>2 you just mentioned? We can take them in turn. Do you</p> <p>3 know is there one particular vendor who provides the</p> <p>4 treatment if needed?</p> <p>5 A. There's multiple vendors.</p> <p>6 Q. Okay. Can you just give me an example of one?</p> <p>7 A. Dr. Jessica Batts.</p> <p>8 Q. Gotcha.</p> <p>9 How about the drug testing, is there -- are</p> <p>10 there multiple vendors who handle that?</p> <p>11 A. There's one vendor.</p> <p>12 Q. And does that -- does that vendor handle all</p> <p>13 drug -- or drug testing for all specialty programs or</p> <p>14 specialty courts operated by Tarrant County?</p> <p>15 A. Yes.</p> <p>16 Q. And the educational program you mentioned, do</p> <p>17 you know is there one vendor who would do that?</p> <p>18 A. No, there's multiple vendors.</p> <p>19 Q. Can you give me just one example?</p> <p>20 A. MHMR of Tarrant County.</p> <p>21 Q. Okay. Does MHMR, would they provide any of</p> <p>22 the treatment that you mentioned?</p> <p>23 A. Yes.</p> <p>24 Q. So we could take the three in turn, too. Do</p> <p>25 you know how the drug testing in the program is paid</p>

<p style="text-align: right;">Page 54</p> <p>1 for?</p> <p>2 A. The drug testing is paid through grant funds,</p> <p>3 and when grant funds run out, we receive money from the</p> <p>4 county, as well as participant payments.</p> <p>5 Q. Participant payments, when you say that, are</p> <p>6 you referring to the fees they pay to be part of the</p> <p>7 program?</p> <p>8 A. Yes.</p> <p>9 Q. So -- so on top of fees and grants, sometimes</p> <p>10 there's still costs that need to be covered and the</p> <p>11 county would pay for those?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know how -- how often that happens in a</p> <p>14 given year?</p> <p>15 A. In the past couple of years, it's been</p> <p>16 annually.</p> <p>17 Q. Annually.</p> <p>18 Can you ballpark the amount of money Tarrant</p> <p>19 County has had to spend to cover that cost?</p> <p>20 A. Some years they put in up to 75,000.</p> <p>21 Q. And, you know, is that a trend that's going</p> <p>22 up, the amount of money that Tarrant County has to cover</p> <p>23 for drug testing?</p> <p>24 A. That trend has been increasing, yes.</p> <p>25 Q. Do you know why?</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. I did see that term "enhancement" in</p> <p>2 documents. I wasn't sure what that meant. What does it</p> <p>3 mean when -- you know, when a program, you know, is an</p> <p>4 enhancement program?</p> <p>5 A. An enhancement program means that they maybe</p> <p>6 taking care of co-occurring behaviors, such as the</p> <p>7 person is experiencing substance abuse as well as</p> <p>8 trauma.</p> <p>9 Q. So I thought Veterans Court treats more than</p> <p>10 just substance abuse, though, doesn't it?</p> <p>11 A. It does.</p> <p>12 Q. So why wouldn't that be an enhancement</p> <p>13 program?</p> <p>14 A. Because Veterans Court started out doing those</p> <p>15 things. To enhance it would mean that we have added</p> <p>16 that as a part of that program. It started out treating</p> <p>17 multiple things.</p> <p>18 Q. Got it. Okay.</p> <p>19 So for the substance abuse treatment that we</p> <p>20 just discussed, does CCA or anyone track, you know, what</p> <p>21 particular substances participants in the program have a</p> <p>22 problem with?</p> <p>23 A. No.</p> <p>24 Q. Can sometimes it be multiple -- strike that.</p> <p>25 Can a participant sometimes have struggled</p>
<p style="text-align: right;">Page 55</p> <p>1 A. The grants are tending to be reduced.</p> <p>2 Q. Do you know why that is?</p> <p>3 A. Grants are designed to be seed money, and the</p> <p>4 longer -- they don't want you to have grants forever, so</p> <p>5 the grant providers usually will taper off the amount</p> <p>6 that they provide, so that if there's other counties</p> <p>7 that are applying for the grants, other agencies that</p> <p>8 are applying for grants, that they can bring on new</p> <p>9 programs as well.</p> <p>10 Q. Is there any possibility that Tarrant County</p> <p>11 will be able to find other grant providers to cover the</p> <p>12 costs that's, you know, eroding from the grants that you</p> <p>13 have had?</p> <p>14 A. It's --</p> <p>15 MS. AYACHI: Objection, form.</p> <p>16 Q. (BY MR. FORD) You can answer.</p> <p>17 A. We have continued to look for other grants,</p> <p>18 but it's been difficult to find funding for the</p> <p>19 specialty courts.</p> <p>20 Q. Do you know why that -- or is there an</p> <p>21 explanation as to why that is?</p> <p>22 A. Usually they're looking for like enhancement</p> <p>23 programs, programs that are doing something with --</p> <p>24 maybe it's a tribal program. It's just we don't meet</p> <p>25 all of the qualifications that they've looking for.</p>	<p style="text-align: right;">Page 57</p> <p>1 with multiple substances?</p> <p>2 A. Yes.</p> <p>3 Q. And do you see, going back to the exhibit, the</p> <p>4 language "close judicial supervision and mentoring of</p> <p>5 all participants." I was wondering what is the</p> <p>6 mentoring of all participants, what does that mean?</p> <p>7 A. So the mentoring -- do you want the close</p> <p>8 supervision first, or the --</p> <p>9 So close supervision means that they meet with</p> <p>10 the judge. They meet face to face in a court that's set</p> <p>11 up just for them. It's a docket that is just for the</p> <p>12 specialty court. The judge presides over that program.</p> <p>13 They talk to them individually. They talk to them as a</p> <p>14 group. Then the mentoring may be graduates. Graduates</p> <p>15 who have graduated the program come back, and they're</p> <p>16 wanting to help people that are coming into the program</p> <p>17 be successful.</p> <p>18 Q. Got it.</p> <p>19 Are those mentors, are they paid?</p> <p>20 A. Not by Tarrant County.</p> <p>21 Q. And the judge on the -- are there multiple</p> <p>22 judges on the Veterans Treatment Court or just one?</p> <p>23 A. There's two.</p> <p>24 Q. Two.</p> <p>25 Do they receive a salary for their work on</p>

<p style="text-align: right;">Page 58</p> <p>1 Veterans Treatment Court?</p> <p>2 A. No, it's within their salary, same salary.</p> <p>3 Q. So if they weren't on the Veteran Treatment</p> <p>4 Court, they would be receiving the same salary?</p> <p>5 A. They would be receiving the same salary.</p> <p>6 Q. Is that how it is for each specialty court?</p> <p>7 A. Yes.</p> <p>8 Q. And specialty program?</p> <p>9 A. Yes.</p> <p>10 Q. I saw on page 6, if you turn there, under</p> <p>11 Roman numeral III, and then A, it says, Team Members and</p> <p>12 Roles. The first one says, The Judge.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. I was wondering, do you know how a judge ends</p> <p>16 up on, you know, a drug court or a specialty court?</p> <p>17 A. They usually volunteer because it's extra work</p> <p>18 for the same pay.</p> <p>19 Q. I have seen some emails to that effect of</p> <p>20 judges saying that, but --</p> <p>21 Okay. Are they ever appointed if no one</p> <p>22 raises their hand?</p> <p>23 A. No.</p> <p>24 Q. And then the next page, page 7, do you see</p> <p>25 under B it says Eligibility? Do you see that towards</p>	<p style="text-align: right;">Page 60</p> <p>1 analysis that would keep track of, you know, how many</p> <p>2 participants have substance abuse problems?</p> <p>3 A. The program managers may have that. I don't</p> <p>4 have that.</p> <p>5 Q. Do you know if, you know, to the extent they</p> <p>6 do have that information, whether it gets specific</p> <p>7 enough to say what substances the participant has a</p> <p>8 problem with?</p> <p>9 A. I do not know.</p> <p>10 Q. And can you say generally whether opioid abuse</p> <p>11 in Tarrant County has impacted the veterans treatment</p> <p>12 council?</p> <p>13 A. State your question again.</p> <p>14 MS. AYACHI: Objection, form.</p> <p>15 Q. (BY MR. FORD) Can you say whether opioid</p> <p>16 abuse in Tarrant County has impacted the veterans</p> <p>17 treatment council?</p> <p>18 MS. AYACHI: Objection, form.</p> <p>19 A. I'm not sure.</p> <p>20 Q. (BY MR. FORD) You're not sure because you</p> <p>21 don't know or because you don't understand -- because I</p> <p>22 asked a bad question?</p> <p>23 A. No, I don't think it was a bad question. I</p> <p>24 can't say that it was opioids that is the specific</p> <p>25 substance, because when someone is referred to substance</p>
<p style="text-align: right;">Page 59</p> <p>1 the bottom of the page?</p> <p>2 A. Yes.</p> <p>3 Q. And then further down under 1 it says to be</p> <p>4 eligible for the Tarrant County Veterans Treatment Court</p> <p>5 and then has some language.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. In reading this paragraph -- and if you need a</p> <p>9 minute, I will definitely give it to you.</p> <p>10 It looks like that if a veteran comes and has</p> <p>11 only substance abuse, would they be eligible for the</p> <p>12 program?</p> <p>13 A. Yes.</p> <p>14 Q. But not every participant in the Veterans</p> <p>15 Treatment Court has a substance abuse problem?</p> <p>16 A. All of -- 90 percent of our veterans have</p> <p>17 substance abuse problems. The other 10 percent we're</p> <p>18 looking at people with traumatic brain injuries.</p> <p>19 Q. Got it.</p> <p>20 And do you have any idea of what -- idea what</p> <p>21 portion -- never mind, you just answered that.</p> <p>22 Is there -- do you keep track of, in any form,</p> <p>23 the participants that do have a substance abuse problem?</p> <p>24 A. I personally do not, no.</p> <p>25 Q. Do you know of any, you know, document or</p>	<p style="text-align: right;">Page 61</p> <p>1 abuse counseling, it's usually multiple substances that</p> <p>2 they're using.</p> <p>3 Q. Got it. Thanks.</p> <p>4 Now I want to switch gears to the Mental</p> <p>5 Health Division -- Diversion Program. Are you still</p> <p>6 good, or do you want to take a break?</p> <p>7 A. I'm good.</p> <p>8 Q. Okay. So for the Mental Health Diversion</p> <p>9 Program, how would you describe -- do you know, you</p> <p>10 know, who is eligible to participate in the program?</p> <p>11 A. It's based on the criteria that the District</p> <p>12 Attorney's Office sets up.</p> <p>13 Q. Do you know if -- if an applicant has a</p> <p>14 problem with substance abuse, if that on its own is</p> <p>15 enough to qualify for the Mental Health Diversion</p> <p>16 Program?</p> <p>17 A. Not if they do not have a mental health</p> <p>18 diagnosis.</p> <p>19 Q. Can you explain to me how the Mental Health</p> <p>20 Diversion Program is funded?</p> <p>21 A. The Mental Health Diversion Program is funded</p> <p>22 through county funds and a grant from the state.</p> <p>23 Q. And the county funds that are used for the</p> <p>24 program, are they dedicated to a specific thing or</p> <p>25 things?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. Yes.</p> <p>2 Q. What are county funds used for in relation to</p> <p>3 operating the Mental Health Diversion Program?</p> <p>4 A. Salaries and positions.</p> <p>5 Q. Do you know how many positions there are in</p> <p>6 the Mental Health Diversion Program currently?</p> <p>7 A. There's two positions, and actually that</p> <p>8 budget also includes treatment because the governor's</p> <p>9 office reduced the budget so low.</p> <p>10 Q. When did that happen?</p> <p>11 A. Probably about five years ago.</p> <p>12 Q. Do you know what portion of treatment is</p> <p>13 funded by Tarrant County?</p> <p>14 A. 100 percent of the treatment is provided for</p> <p>15 in the mental health court by Tarrant County.</p> <p>16 Q. Tarrant County funds 100 percent of the</p> <p>17 treatment that's provided?</p> <p>18 A. Yes.</p> <p>19 Q. Can you describe the treatment that's provided</p> <p>20 through the Mental Health Diversion Program?</p> <p>21 A. It will be mental health, behavioral health</p> <p>22 or -- and/or substance abuse.</p> <p>23 Q. Regarding substance abuse, do you know what</p> <p>24 sort of treatment is provided?</p> <p>25 A. Substance abuse treatment with a private</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Do you have any idea what portion of</p> <p>2 participants in the Mental Health Diversion Program have</p> <p>3 substance abuse issues?</p> <p>4 A. I'll say probably about 80, 85 percent.</p> <p>5 Q. Do you know if that number is tracked</p> <p>6 anywhere, like in any kind of document?</p> <p>7 A. I do not know.</p> <p>8 Q. And, you know, for that 80 percent, do you</p> <p>9 know if you have any data showing specifically which</p> <p>10 substances the participant is struggling with?</p> <p>11 A. I'm not sure.</p> <p>12 Q. Do you know if -- if you had that question, is</p> <p>13 there someone at CCA that you would ask for the answer?</p> <p>14 A. If the state were to ask me, I would have to</p> <p>15 rely on the program managers, and they would rely on the</p> <p>16 drug test.</p> <p>17 Q. When you say the drug test, the results of</p> <p>18 drug tests taken by participants?</p> <p>19 A. Yes.</p> <p>20 Q. Is that drug test taken at the beginning of</p> <p>21 when they -- you know, is there -- strike that.</p> <p>22 So when you say they would rely on the drug</p> <p>23 tests, the data would be -- if a drug test tests</p> <p>24 positive for an opiate, then that participant has a</p> <p>25 substance abuse problem with opioids?</p>
<p style="text-align: right;">Page 63</p> <p>1 vendor and also substance abuse education.</p> <p>2 Q. So are those two services the same as the</p> <p>3 services that are provided for -- through the Veterans</p> <p>4 Treatment Court for substance abuse issues?</p> <p>5 A. Yes, but on a different scale.</p> <p>6 Q. On a grander scale or a lesser scale?</p> <p>7 A. Probably on a lesser scale, because the number</p> <p>8 one objective is to get the person stabilized so that</p> <p>9 they can then go through the behavioral health</p> <p>10 treatment.</p> <p>11 Q. Got it.</p> <p>12 And is it right that -- is MHMR a vendor for</p> <p>13 the substance abuse treatment that's provided through</p> <p>14 the Mental Health Diversion Program?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know if MHMR provides all substance</p> <p>17 abuse treatment?</p> <p>18 A. They do not.</p> <p>19 Q. You have other vendors --</p> <p>20 A. Yes.</p> <p>21 Q. -- that the county uses?</p> <p>22 Do you know how many other vendors?</p> <p>23 A. We provide one, two -- maybe three other</p> <p>24 vendors, and then there's also participants that use</p> <p>25 private vendors.</p>	<p style="text-align: right;">Page 65</p> <p>1 A. It would require --</p> <p>2 MS. AYACHI: Objection, form.</p> <p>3 A. It would require random testing.</p> <p>4 Q. (BY MR. FORD) So other than the drug testing</p> <p>5 results, is there any source of information that you can</p> <p>6 think of that would show which participants in the</p> <p>7 Mental Health Diversion Program struggle specifically</p> <p>8 with opioid abuse?</p> <p>9 A. Self-reporting.</p> <p>10 Q. Are there -- is there regular self-reporting</p> <p>11 in the program?</p> <p>12 A. Yes.</p> <p>13 Q. What kind of document is created from</p> <p>14 self-reporting?</p> <p>15 A. The chronological notes are kept into the case</p> <p>16 manager's case management system, and then it's</p> <p>17 addressed in court.</p> <p>18 Q. Can you say whether -- sort of the same</p> <p>19 question -- whether opioid abuse in Tarrant County has</p> <p>20 impacted the Mental Health Diversion Program?</p> <p>21 A. Yes.</p> <p>22 Q. And why do you say yes?</p> <p>23 A. For the Mental Health Court, a lot of times</p> <p>24 they're taking meds to feel better. And it doesn't</p> <p>25 matter whose medication it is, it doesn't matter where</p>

<p style="text-align: right;">Page 66</p> <p>1 they got the medication from; they're just trying to 2 cope with all of the different behavioral health 3 problems that they're having. 4 Q. I understand your answer, but I was just 5 wondering, so how would you say that opioid abuse has 6 impacted MHDP, the Mental Health Diversion Program? 7 A. MHDP goes to the ER in the hospitals a lot 8 more than any other population that we have, so it's 9 easier to get their medical information. 10 Q. So because you have more medical information, 11 you can see that opioid abuse is a problem to many 12 participants? 13 A. It has impacted the program, yes. 14 Q. And have you seen that impact increase over 15 time? 16 A. I wouldn't say increase. 17 Q. Okay. I'm going to switch gears to the First 18 Offender Drug Program. Are you still good to keep going 19 or do you want a break? 20 A. I am good. 21 Q. So can you describe for me what the First 22 Offender Drug Program is? 23 A. The First Offender Drug Program was a program 24 created by the criminal court judges and the District 25 Attorney's Office and Sheriff's Department, and the</p>	<p style="text-align: right;">Page 68</p> <p>1 Is that incorrect to say that? 2 A. That would be incorrect. 3 Q. Does the D.I.R.E.C.T. Diversion Program still 4 exist? 5 A. That is the D.I.R.E.C.T. Program. It's no 6 longer a diversion program because now the cases are 7 postadjudicated. Diversion simply meant that they were 8 preadjudicated. 9 Q. So is there no role in D.I.R.E.C.T. for 10 preadjudication anymore? 11 A. That is correct. 12 Q. And did that change in 2012? 13 A. I think so. 14 Q. So, let me see. Hold on. 15 Do you know what the eligibility requirements 16 are to take part in FODP? 17 A. Not without looking at the documents. 18 Q. Documents. Well, I've got one for you. 19 Okay. Let me -- I will introduce this. We 20 skipped a couple of big ones. So I will mark -- 21 MR. FORD: Is this Exhibit 5? 22 Q. (BY MR. FORD) We'll mark what's -- I will 23 pass you what's been marked as Exhibit 5. 24 (Exhibit 5 marked.) 25 Q. (BY MR. FORD) Here you go.</p>
<p style="text-align: right;">Page 67</p> <p>1 design of the program is for people who are facing their 2 first arrest involving controlled substances. And they 3 pretty much go in, they tell the judge this is not who I 4 am, this is not what I do, this will never happen again. 5 We call them self-correctors. They are then placed on 6 an open plea and put into the First Offender Drug 7 Program. 8 Q. Got it. 9 I was going to ask what a "self-corrector" 10 was. I wasn't sure what that -- can you explain what 11 that term means? 12 A. Self-corrector means I do not need any type of 13 assistance, I do not need any hand holding, I can take 14 care of this, this mistake will never be made again. 15 Q. And do you know when the First Offender Drug 16 Program -- do you call it FODP? 17 A. FODP. 18 Q. Do you know when FODP was created? 19 A. I don't remember the date. 20 Q. Was it within the past decade? 21 A. Yes. 22 Q. Did FODP replace any other program? 23 A. No. 24 Q. I was seeing some documents that suggested it 25 might have replaced the D.I.R.E.C.T. Diversion Program.</p>	<p style="text-align: right;">Page 69</p> <p>1 MR. FORD: And I will publish it on 2 Exhibit Share now. Okay. I have introduced Exhibit 5 3 in Exhibit Share. 4 Q. (BY MR. FORD) And, Ms. Bennett-Wright, I 5 would like to ask you about the attachment to this. Do 6 you see the cover email, do you see that it's from you? 7 A. Yes. 8 Q. Do you have any reason to doubt that you sent 9 this email? 10 A. No. 11 Q. Okay. And it looks like the attachment is an 12 FODP information booklet? 13 A. Yes. 14 Q. Do you recognize this document? 15 A. I do. 16 Q. Okay. So can I direct you to page 10? Or, 17 sorry, page 3. Do you see on the top it says list of 18 eligible offenses? 19 Do you see that? 20 A. Yes. 21 Q. And I think we've already actually covered 22 this list today. 23 A. Uh-huh. 24 Q. Do you see number 10 says diversion of a 25 controlled substance?</p>

<p style="text-align: right;">Page 70</p> <p>1 A. I do.</p> <p>2 Q. Do you know whether that would include</p> <p>3 diversion of an opioid?</p> <p>4 A. I'm not sure. That would have been the</p> <p>5 District Attorney's call.</p> <p>6 Q. Gotcha.</p> <p>7 Yeah, and you said the District Attorney set</p> <p>8 the eligibility; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know how they determine who is</p> <p>11 eligible?</p> <p>12 A. They set the offenses. I don't know how they</p> <p>13 determine that.</p> <p>14 Q. Got it.</p> <p>15 And could you flip back to page 2, please. Do</p> <p>16 you see towards the bottom it says Program Cost in bold?</p> <p>17 A. Yes.</p> <p>18 Q. And then it lists, you know, amounts for</p> <p>19 felony and misdemeanor.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Are these the cost of the fees for a</p> <p>23 participant to take part in the program?</p> <p>24 A. Yes.</p> <p>25 Q. And so felony, it says \$550; is that right?</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. And does Tarrant County pay for the salaries?</p> <p>2 A. Yes.</p> <p>3 Q. Are any portion of the salaries covered by</p> <p>4 grants?</p> <p>5 A. No.</p> <p>6 Q. How many salaries are part of the FODP</p> <p>7 program?</p> <p>8 A. Two.</p> <p>9 Q. Are those case managers?</p> <p>10 A. It's a case manager and an administrative</p> <p>11 assistant.</p> <p>12 Q. Have those always -- have those salaries for</p> <p>13 those positions always been paid for by the county?</p> <p>14 A. Yes.</p> <p>15 Q. So back to, I guess, the participants of the</p> <p>16 program.</p> <p>17 A. Uh-huh.</p> <p>18 Q. Do you know of any way that the program tracks</p> <p>19 what particular substance a participant is struggling</p> <p>20 with -- or strike that.</p> <p>21 Is there any way that the program tracks, you</p> <p>22 know, what substance was involved in the offense that</p> <p>23 led to the participant joining the program?</p> <p>24 A. We don't track the substance that the person</p> <p>25 came in the program with. There's a baseline drug test,</p>
<p style="text-align: right;">Page 71</p> <p>1 A. Yes.</p> <p>2 Q. Do you know if that's currently the price?</p> <p>3 A. That is.</p> <p>4 Q. And then next to it, it lists, you know,</p> <p>5 some -- some services, I guess, or treatments.</p> <p>6 A. Correct.</p> <p>7 Q. Is that what is covered under the program?</p> <p>8 A. Yes.</p> <p>9 Q. Does that 550 cover the entirety of the</p> <p>10 services there?</p> <p>11 A. Yes.</p> <p>12 Q. Is it the same thing for the misdemeanor?</p> <p>13 A. Yes.</p> <p>14 Q. So is there any portion of the FODP that is</p> <p>15 covered by something other than fees? Sorry, let me</p> <p>16 rephrase that. I misread it.</p> <p>17 Are there any costs associated with the FODP</p> <p>18 that is covered by something other than the fees the</p> <p>19 participants pay?</p> <p>20 A. Yes.</p> <p>21 Q. What would that be?</p> <p>22 A. Salaries.</p> <p>23 Q. Salaries, is there anything other than</p> <p>24 salaries?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 73</p> <p>1 and if it's -- say it's -- then there's time for that</p> <p>2 baseline drug test to clear out of their system. If the</p> <p>3 drug shows up again, they're removed from the program.</p> <p>4 Q. How about if a different drug shows up in a</p> <p>5 test, would that also lead them to get kicked out of the</p> <p>6 program?</p> <p>7 A. If they have a prescription for the drug, they</p> <p>8 can continue the program; if they do not, they're</p> <p>9 removed from the program.</p> <p>10 Q. If a participant has a prescription for</p> <p>11 opioids, is that permitted in the program?</p> <p>12 A. If they have a prescription, yes.</p> <p>13 Q. So in the program, is the only way that</p> <p>14 tracking is done -- sorry, strike that.</p> <p>15 In the FODP, is drug testing the only way that</p> <p>16 tracks what controlled substances -- what substances are</p> <p>17 used by participants? Do you want me to reask that?</p> <p>18 MS. AYACHI: Objection, form.</p> <p>19 Q. (BY MR. FORD) In the FODP, is drug testing</p> <p>20 the only way that tracks what substances are used by the</p> <p>21 participants?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. I got another exhibit.</p> <p>24 MR. FORD: Is this Exhibit 6?</p> <p>25 THE REPORTER: Yes.</p>

<p style="text-align: right;">Page 74</p> <p>1 (Exhibit 6 marked.)</p> <p>2 Q. (BY MR. FORD) I am marking what's going to be</p> <p>3 Exhibit 6. Here you go.</p> <p>4 A. Thank you.</p> <p>5 MR. FORD: Now I will publish it real</p> <p>6 quick.</p> <p>7 Okay. My computer is about to die. I picked</p> <p>8 a bad plug. There we go.</p> <p>9 So I just introduced in Exhibit Share what's</p> <p>10 been marked as Exhibit 6.</p> <p>11 Q. (BY MR. FORD) Ms. Bennett-Wright, do you see</p> <p>12 that the first page is an email that looks like it's --</p> <p>13 the top portion is sent to you; is that right?</p> <p>14 A. That is correct.</p> <p>15 Q. Do you have any reason to believe you didn't</p> <p>16 receive this email?</p> <p>17 A. No.</p> <p>18 Q. And it looks like -- I wanted to ask you about</p> <p>19 the attachments, and it looks like the attachments,</p> <p>20 they're labeled FODP stat tracking for two fiscal years.</p> <p>21 A. Yes.</p> <p>22 Q. Yeah, does that look right to you in looking</p> <p>23 at these numbers or the attachments?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. So on that first page -- they're Excel</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. And that's through fees that are paid by</p> <p>2 participants?</p> <p>3 A. Yes.</p> <p>4 Q. And that -- that next column over, what does</p> <p>5 that show?</p> <p>6 A. That would be for anyone that was entering</p> <p>7 into the program.</p> <p>8 Q. So I'm --</p> <p>9 A. So the deposit amount of program fees would be</p> <p>10 what we actually -- because we didn't begin with zero.</p> <p>11 Where it says beginning of the month, that would have</p> <p>12 been the number of people in the program --</p> <p>13 Q. Okay.</p> <p>14 A. -- currently in the program. And fees are not</p> <p>15 required to be paid for all at once. Some people are</p> <p>16 paying fees through the entire time that they're in the</p> <p>17 program.</p> <p>18 The last column would be what is -- what has</p> <p>19 been assessed as the new amount to be added for new</p> <p>20 applicants that have been admitted. So the 42 would be</p> <p>21 for the second column, and the 127 is for the deposited</p> <p>22 column.</p> <p>23 Q. Okay. Got it.</p> <p>24 Okay. And then if you flip over two pages to</p> <p>25 the page that's titled "Relapse Pattern," do you see</p>
<p style="text-align: right;">Page 75</p> <p>1 spreadsheets, so there's no like numbering on them, but</p> <p>2 the first page is titled "Monthly Statistical Report"</p> <p>3 for fiscal year 2017.</p> <p>4 A. Yes.</p> <p>5 Q. Are you there?</p> <p>6 A. Yes.</p> <p>7 Q. I just wanted to look at -- or ask you about</p> <p>8 some of these columns.</p> <p>9 Do you know what's meant by the submissions</p> <p>10 column, that first column?</p> <p>11 A. Submissions means that there was an</p> <p>12 application submitted to the District Attorney's Office</p> <p>13 for participation.</p> <p>14 Q. And is there a column that reflects how many</p> <p>15 people were actually admitted to the program?</p> <p>16 A. Yes.</p> <p>17 Q. Is that the column that's labeled admitted?</p> <p>18 A. Yes.</p> <p>19 Q. And then the last two columns, the</p> <p>20 second-to-last column says deposited program fees. Do</p> <p>21 you know what this column indicates?</p> <p>22 A. Yes.</p> <p>23 Q. What does it -- what does it show?</p> <p>24 A. That's the amount that was deposited for that</p> <p>25 month.</p>	<p style="text-align: right;">Page 77</p> <p>1 that?</p> <p>2 A. Yes.</p> <p>3 Q. Do you see in -- so can you tell me what this</p> <p>4 page depicts -- not "depicts." Can you tell me what</p> <p>5 sort of information is contained in this page?</p> <p>6 A. It's a review of what the UAs and hair tests</p> <p>7 have reported.</p> <p>8 Q. And what's a UA?</p> <p>9 A. A drug urinalysis.</p> <p>10 Q. So that second box down that's titled</p> <p>11 "Positive Drug Test," do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Then there's categories of substances below</p> <p>14 that. Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Are those the different categories they're</p> <p>17 tested for?</p> <p>18 A. Yes.</p> <p>19 Q. Do you see the one that says opiates?</p> <p>20 A. I do.</p> <p>21 Q. So I was wondering if a participant comes in</p> <p>22 and their test shows positive for opioids and, say,</p> <p>23 meth, would -- would that test show up in each category?</p> <p>24 A. Yes.</p> <p>25 Q. So one test could be accounting for, you know,</p>

<p style="text-align: right;">Page 78</p> <p>1 multiple categories here?</p> <p>2 A. Yes. There's seven -- the test is a</p> <p>3 seven-panel test.</p> <p>4 Q. Got it.</p> <p>5 So I guess I don't need to ask that question</p> <p>6 now, but on the first page, the cover email, if I could</p> <p>7 ask one more question.</p> <p>8 The person that responded is Alexander D. Rae.</p> <p>9 Do you know who that is?</p> <p>10 A. I do.</p> <p>11 Q. And do you see the message from the person</p> <p>12 says, I don't have any for 14 or 15?</p> <p>13 A. Yes.</p> <p>14 Q. And that's referring to that person doesn't</p> <p>15 have any end-of-year reports for fiscal year 2014 or</p> <p>16 2015; is that right?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know why that is?</p> <p>19 A. Why they don't have the stats?</p> <p>20 Q. I was wondering if it's because that the</p> <p>21 program didn't record it in those years or, you know, if</p> <p>22 it's some other reason.</p> <p>23 A. I'm going to say that it was probably because</p> <p>24 the program that -- whoever was in the position during</p> <p>25 those times didn't record the information.</p>	<p style="text-align: right;">Page 80</p> <p>1 A. Yes.</p> <p>2 Q. Is this the same report that we looked at for</p> <p>3 fiscal years 2016 and 2017?</p> <p>4 A. Yes.</p> <p>5 Q. Now do you see the number of submissions in</p> <p>6 the first column, the total 185? It's kind of blurry.</p> <p>7 A. Oh, yes, at the -- at the bottom, I see it.</p> <p>8 Q. And then -- so that's the number of people</p> <p>9 that applied to be in the program that year; is that</p> <p>10 right?</p> <p>11 A. Correct.</p> <p>12 Q. And then the admitted column a few over, do</p> <p>13 you see it says 125?</p> <p>14 A. I do.</p> <p>15 Q. And that's the total people that took part in</p> <p>16 the program?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. I'll represent to you this is the last</p> <p>19 year that I could find with a complete year of stats.</p> <p>20 There was one for 2022, but it was partial. But my</p> <p>21 question is this. I noticed -- and you might have to</p> <p>22 look back at the last exhibit, but that the number of</p> <p>23 participants have gone down pretty significantly, both</p> <p>24 in terms of people that submitted an application to be</p> <p>25 part of the program and the people that were admitted.</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Got it.</p> <p>2 Okay. And then there's -- I've got to</p> <p>3 introduce one more exhibit to ask one more question. So</p> <p>4 I'm going to mark Exhibit 7 and pass it to you.</p> <p>5 (Exhibit 7 marked.)</p> <p>6 MR. FORD: Here you go.</p> <p>7 MR. OGLE: Thanks.</p> <p>8 MR. FORD: This isn't stapled. Sorry</p> <p>9 about that. And I am introducing it on Exhibit Share</p> <p>10 now.</p> <p>11 Okay. I have introduced now in Exhibit Share</p> <p>12 what's been marked Exhibit 7.</p> <p>13 Q. (BY MR. FORD) Ms. Bennett-Wright, do you see</p> <p>14 the cover email?</p> <p>15 A. I do.</p> <p>16 Q. It includes you on it?</p> <p>17 A. Yes.</p> <p>18 Q. And the attachment I want to ask you about, it</p> <p>19 looks like it's the FODP stats for August 2021.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. So if you flip to the attachment, it's going</p> <p>23 to be the third page to that, yeah -- yes, the third</p> <p>24 page that says Monthly Statistical Report.</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 81</p> <p>1 A. Yes.</p> <p>2 Q. I was just wondering if there was an</p> <p>3 explanation for that level of decrease?</p> <p>4 A. The applications that are approved for the</p> <p>5 program are dependent on the District Attorney's Office.</p> <p>6 During 2020 through probably 2021, end of 2022, the</p> <p>7 District Attorney's Office was changing the assistant</p> <p>8 district attorneys that were being placed over the</p> <p>9 program to approve applications. So it's a matter of</p> <p>10 them learning what they were looking for, as far as for</p> <p>11 putting people in the program, and also they kept</p> <p>12 changing.</p> <p>13 So the more changes there were, the less</p> <p>14 applications would come in. Because you would have</p> <p>15 90 days to actually apply for the program from the time</p> <p>16 of the case being filed, a lot of people were running</p> <p>17 out of time.</p> <p>18 Also, that was during the time of COVID.</p> <p>19 And with COVID, the operations in the court changed</p> <p>20 significantly. So attorneys may not have been appointed</p> <p>21 within the 90 days, and they may not have -- once they</p> <p>22 got the case to the District Attorney's Office, it may</p> <p>23 not have been approved within that time span.</p> <p>24 Q. Gotcha.</p> <p>25 So, like I said, I found a partial reporting</p>

<p style="text-align: right;">Page 82</p> <p>1 for 2022 that still seemed to be a little down, and I 2 don't know what it is in 2023. Do you have any 3 knowledge of whether submissions are going up this year? 4 A. Submissions are going up this year. I don't 5 think there -- another thing that changed between 2017 6 and 2021 is the laws for THC. So marijuana cases now 7 have a different track that they can take. They don't 8 have to go through the -- through this particular 9 program. 10 Q. What's the different track they can take? 11 A. Some of them can do a memo with the District 12 Attorney's Office, and the memo requires that they stay 13 clean for 90 days and their case may be dismissed, which 14 is a lot easier than our program for 180 days. 15 Q. But even not with standing that change, the 16 submissions are going up this year? 17 A. The submissions are going up since COVID, yes. 18 Q. Do you know why that is? 19 A. I would say with full operations in the court, 20 the defense attorneys are able to get appointed to the 21 cases; and once they're appointed, they're able to file 22 the application with the District Attorney's Office 23 before the 90 days runs out. 24 Q. Do you know if this sort of report is being 25 generated for, you know, a full one for 2022 and will be</p>	<p style="text-align: right;">Page 84</p> <p>1 similar this year? 2 A. They are never going to look like that again. 3 Q. Why is that? 4 A. The laws have changed, and the laws have 5 changed -- again, the majority of the cases would have 6 been misdemeanor cases, and misdemeanor cases are now 7 handled a different way through the state of Texas 8 statutes. 9 Q. Got it. 10 THE VIDEOGRAPHER: Counsel, I need to 11 start a new media unit. Can we go off the record? 12 MR. FORD: Sure. 13 THE VIDEOGRAPHER: We're off the record 14 at 11:55 a.m. 15 (Break from 11:55 a.m. to 12:08 p.m.) 16 THE VIDEOGRAPHER: We are back on the 17 record at 12:08 p.m. 18 Q. (BY MR. FORD) Okay. Ms. Bennett-Wright, so 19 now I want to talk about the D.I.R.E.C.T. Program. 20 A. Okay. 21 Q. So you said that currently CCA has no role in 22 the D.I.R.E.C.T. Program; is that right? 23 A. That is correct. 24 Q. So CCA doesn't administer anything regarding 25 the D.I.R.E.C.T. Program; that's all under CSCD?</p>
<p style="text-align: right;">Page 83</p> <p>1 generated for 2023? 2 A. The reports probably have not been generated 3 for 2022 and 2023, because we also have an electronic 4 case management system, so they wouldn't come through in 5 Excel. 6 Q. Okay. When you say in Excel, what do you 7 mean? 8 A. They wouldn't be in an Excel report. 9 Q. Oh. So there's another way that the CCA is 10 tracking it? 11 A. Yes. 12 Q. And what's that system? 13 A. It's CSS. It's Court Software Solutions, and 14 we track our information inside of an electronic system. 15 Q. So do you know when that was implemented? 16 A. 2010. No, 2020, I'm sorry. 17 Q. 2020, okay. Was it October 2020? 18 A. Yes. 19 Q. I know this is -- you might not -- well, do 20 you have any idea -- let me restart that question one 21 more time. 22 So looking at the fiscal year 2017 for the 23 FODP statistical report, you know, submissions are 681 24 and the admissions are 484. Do you have any idea 25 whether, you know, the numbers are the same this year or</p>	<p style="text-align: right;">Page 85</p> <p>1 A. That is correct. 2 Q. Does CSCD have any role in applying for, 3 obtaining or handling grants that fund the D.I.R.E.C.T. 4 Program? 5 A. No. 6 Q. And I think I asked you this, but did CCA ever 7 administer the D.I.R.E.C.T. Program? 8 A. Yes. 9 Q. And is it generally referred to as the 10 D.I.R.E.C.T. Drug Court? 11 A. Right. 12 Q. Okay. So I was wondering if I could ask you 13 just a couple questions about it. So I saw -- I will 14 introduce this exhibit now to help ask these questions. 15 MR. FORD: Am I on 8? 16 THE REPORTER: Yes. 17 MR. FORD: Thank you. 18 (Exhibit 8 marked.) 19 Q. (BY MR. FORD) Okay. I am going to pass you 20 what I've marked as Exhibit 8. Here you go. 21 MR. FORD: And I am introducing it on 22 Exhibit Share now. Okay. 23 Q. (BY MR. FORD) All right. Ms. Bennett-Wright, 24 do you see on the first page of this it contains an 25 email?</p>

<p style="text-align: right;">Page 86</p> <p>1 A. Yes.</p> <p>2 Q. And it looks like it's from you to a David</p> <p>3 Hagerman; is that right?</p> <p>4 A. Judge David Hagerman.</p> <p>5 Q. Judge Hagerman.</p> <p>6 And I wanted to ask you, do you see the</p> <p>7 attachment specialty courts and it's a PowerPoint?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recognize this PowerPoint?</p> <p>10 A. Yes.</p> <p>11 Q. Did you put this together?</p> <p>12 A. Originally, yes.</p> <p>13 Q. Okay. Do you know what sort of the purpose of</p> <p>14 this PowerPoint was?</p> <p>15 A. When new judges volunteered for the program,</p> <p>16 Judge Hagerman was taking over the program. I sent it</p> <p>17 to Judge Hagerman so if he wanted to go and speak about</p> <p>18 the program in front of other people.</p> <p>19 Q. Got it.</p> <p>20 So I wanted to show you this because it seemed</p> <p>21 like it summarized some details about the D.I.R.E.C.T.</p> <p>22 Program that I saw pop up other places. So if you could</p> <p>23 turn to -- at the bottom of the page, it's called a</p> <p>24 Bates label and it ends in 923. It's like the fifth or</p> <p>25 sixth page. Do you see that at the bottom it says</p>	<p style="text-align: right;">Page 88</p> <p>1 A. The risk was determined by an assessment. Low</p> <p>2 risk/low needs meaning that their needs were low and</p> <p>3 their risks were low. Needs may be their personal</p> <p>4 needs. Do they have housing? Do they have education?</p> <p>5 If they had housing and education and employment, then</p> <p>6 their needs would be low. Low risk means that they do</p> <p>7 not have an extensive criminal history.</p> <p>8 Q. (BY MR. FORD) Okay. And, you know, when high</p> <p>9 risk/high need is used in the program, can you explain,</p> <p>10 you know, basically what that is, what that would be?</p> <p>11 A. Basically it's the opposite of the low</p> <p>12 risk/low needs. Those are -- their risk level is going</p> <p>13 to be higher because the assessment is going to show a</p> <p>14 longer criminal history. Also, their needs are going to</p> <p>15 be higher because they may not have housing, they may</p> <p>16 not have education, they may not be employed.</p> <p>17 Q. Okay. And are these sort of the two</p> <p>18 categories that the D.I.R.E.C.T. Program deals with, low</p> <p>19 risk/low need and high risk/high need?</p> <p>20 A. 2012, the modifications was actually when we</p> <p>21 were handing it off to CSCD. So at that time, that may</p> <p>22 have been what they were handling. I don't know what</p> <p>23 they're doing today.</p> <p>24 Q. Okay. So the fact that this is -- do you know</p> <p>25 did this PowerPoint, was it created in 2012 then?</p>
<p style="text-align: right;">Page 87</p> <p>1 D.I.R.E.C.T.?</p> <p>2 A. Yes.</p> <p>3 Q. So do you see it says the D.I.R.E.C.T. Court</p> <p>4 was established in 1994?</p> <p>5 A. Yes.</p> <p>6 Q. Is that your understanding?</p> <p>7 A. Yes.</p> <p>8 Q. And do you see where it says, Goal: To provide</p> <p>9 an alternative to incarceration for nonviolent, criminal</p> <p>10 offenders with a history of substance abuse?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know -- would you agree with that</p> <p>13 statement, that's the goal of the D.I.R.E.C.T. Drug</p> <p>14 Court Program?</p> <p>15 A. Yes.</p> <p>16 Q. If you could flip to the next page. This page</p> <p>17 and the next page after that, you know, it talks about</p> <p>18 something I've seen in the documents, which is the</p> <p>19 D.I.R.E.C.T. Program's treatment of low risk/low need</p> <p>20 people versus high risk/high need people.</p> <p>21 Do you have any -- can you explain to me what</p> <p>22 that distinction is all about in the D.I.R.E.C.T.</p> <p>23 Program?</p> <p>24 A. The risk --</p> <p>25 MS. AYACHI: Objection, form.</p>	<p style="text-align: right;">Page 89</p> <p>1 A. It was created before -- yes, it would have</p> <p>2 been after 2012.</p> <p>3 Q. Got it.</p> <p>4 So this might not reflect how the D.I.R.E.C.T.</p> <p>5 Program is today?</p> <p>6 A. That is correct. It would be the decision of</p> <p>7 CSCD.</p> <p>8 Q. Okay. Is it your understanding that today to</p> <p>9 be eligible for the D.I.R.E.C.T. Program, do you know --</p> <p>10 let me rephrase that.</p> <p>11 Do you know how a participant is eligible to</p> <p>12 be part of the D.I.R.E.C.T. Program today?</p> <p>13 A. I know they have to have an extensive</p> <p>14 substance abuse history.</p> <p>15 Q. Does it sound right if -- to say that they</p> <p>16 might qualify if either their offense is substance</p> <p>17 related or if the circumstances around their offense,</p> <p>18 you know, suggests they have a substance abuse problem?</p> <p>19 A. Yes.</p> <p>20 Q. Do you know if alcohol qualifies as a</p> <p>21 substance for purposes of a D.I.R.E.C.T. Program?</p> <p>22 A. I don't know.</p> <p>23 Q. And similar to the -- you know, the questions</p> <p>24 I asked you about the other programs, do you know if</p> <p>25 Tarrant County tracks what controlled substance is at</p>

<p style="text-align: right;">Page 90</p> <p>1 issue? Let me reask that.</p> <p>2 Do you know if Tarrant County tracks what sort</p> <p>3 of substance is at issue for each participant in the</p> <p>4 D.I.R.E.C T. Program?</p> <p>5 A. I do not know.</p> <p>6 Q. If you look back at the exhibit at page --</p> <p>7 let's go first with page 925, the postadjudication</p> <p>8 program. Do you see the second paragraph? The print is</p> <p>9 pretty small but it begins "The treatment plan."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. So this paragraph contains some, you know,</p> <p>13 details of what the treatment plan provided through the</p> <p>14 D.I.R.E.C T. Program would include. Do you know if</p> <p>15 anything listed in this program is still being provided</p> <p>16 by the D.I.R.E.C T. Program today?</p> <p>17 A. I do not know.</p> <p>18 Q. Would someone at CSCD --</p> <p>19 A. Yes.</p> <p>20 Q. -- know that?</p> <p>21 The third paragraph lists -- you know,</p> <p>22 describes where the funding for the D.I.R.E.C.T. Program</p> <p>23 comes from.</p> <p>24 A. Uh-huh.</p> <p>25 Q. Do you have any knowledge about where the</p>	<p style="text-align: right;">Page 92</p> <p>1 MS. AYACHI: Objection, form.</p> <p>2 A. Based on what I know in 1994, the D.I.R.E.C.T.</p> <p>3 Drug Court Program was created because of the numerous</p> <p>4 cases that were coming through the courts. I don't</p> <p>5 specifically know what substance was being directed at.</p> <p>6 Q. (BY MR. FORD) Do you know whether any</p> <p>7 substance -- whether it ever included opioids?</p> <p>8 A. It included every drug.</p> <p>9 Q. So you don't have any knowledge whether one --</p> <p>10 one drug, you know, would impact the services needed or</p> <p>11 the -- provided by the D.I.R.E.C.T. program versus</p> <p>12 another drug?</p> <p>13 A. That is correct.</p> <p>14 Q. Okay. You can set aside that document.</p> <p>15 I just wanted to ask a question generally</p> <p>16 about grants. Can you say, generally speaking, how much</p> <p>17 of the costs associated with the specialty courts we've</p> <p>18 talked here today -- about today, how much are paid</p> <p>19 through grant money?</p> <p>20 A. Properly operated, I would say one of the --</p> <p>21 one of the courts that is properly operated is the</p> <p>22 Veterans Court because it gets most of the funding that</p> <p>23 it needs, and it operates at about \$500,000. With the</p> <p>24 waiting list that we have, I could double that in size</p> <p>25 if we received more money.</p>
<p style="text-align: right;">Page 91</p> <p>1 funding for the D.I.R.E.C T. Program comes from today?</p> <p>2 A. I do not.</p> <p>3 Q. Would someone from CSCD know that?</p> <p>4 A. Yes.</p> <p>5 Q. You know, and the page before that talks about</p> <p>6 the preadjudication. If I asked you the same questions,</p> <p>7 would your answers be the same?</p> <p>8 A. For today?</p> <p>9 MS. AYACHI: Objection, form.</p> <p>10 Q. (BY MR. FORD) Let me ask this. For the</p> <p>11 D.I.R.E.C.T. Program as a whole, do you have any</p> <p>12 knowledge about where the funding for the D.I.R.E.C T.</p> <p>13 Program comes from today?</p> <p>14 A. I do not.</p> <p>15 Q. And do you know what treatment options are</p> <p>16 provided through the D.I.R.E.C T. Program today?</p> <p>17 A. I do not.</p> <p>18 Q. Okay. So can you say whether opioid abuse in</p> <p>19 Tarrant County has impacted the D.I.R.E.C T. Program?</p> <p>20 A. During which period?</p> <p>21 Q. Based on your knowledge, can you say whether</p> <p>22 opioid abuse in Tarrant County has had an impact on the</p> <p>23 D.I.R.E.C T. Drug Court, you know, based on what you</p> <p>24 know?</p> <p>25 A. Based on what I know --</p>	<p style="text-align: right;">Page 93</p> <p>1 Most of the programs I would say are running</p> <p>2 between \$250,000 per program. Such as the Mental Health</p> <p>3 Court, we're receiving about \$100,000 from that in grant</p> <p>4 funds and the rest is coming from the county.</p> <p>5 Q. Okay. So those portions, can you say</p> <p>6 generally, or maybe for each court, what percentage of</p> <p>7 that is the overall cost of the program?</p> <p>8 A. I would say probably about 50 percent of that</p> <p>9 is for the cost of the program --</p> <p>10 Q. Okay.</p> <p>11 A. -- and 50 percent would be in treatment.</p> <p>12 Q. Are you aware that Tarrant County has</p> <p>13 received -- are you aware if Tarrant County has received</p> <p>14 any money as a result of settlements from opioid</p> <p>15 lawsuits?</p> <p>16 A. One of my employees mentioned that they</p> <p>17 received money from a lawsuit.</p> <p>18 Q. Do you know how much money?</p> <p>19 A. I think it was around 2 million.</p> <p>20 Q. Do you know if that amount is the only amount</p> <p>21 of money that Tarrant County has received so far from</p> <p>22 settlements related to opioid lawsuits?</p> <p>23 A. I don't know.</p> <p>24 Q. Do you know how Tarrant County plans to use</p> <p>25 the money it's obtained from settlements relating to</p>

<p style="text-align: right;">Page 94</p> <p>1 opioid lawsuits?</p> <p>2 A. No.</p> <p>3 Q. Do you know if the CCA plans to request that</p> <p>4 any money obtained through settlements relating to</p> <p>5 opioids lawsuits be given to CCA to be used for, you</p> <p>6 know, costs it might have?</p> <p>7 A. No.</p> <p>8 MS. AYACHI: Objection, form.</p> <p>9 Q. (BY MR. FORD) Do you know what the Opioid</p> <p>10 Abatement Fund Council is?</p> <p>11 A. I do not.</p> <p>12 Q. We're on the home stretch.</p> <p>13 Do you want Tarrant County to win this</p> <p>14 lawsuit?</p> <p>15 MS. AYACHI: Objection, form.</p> <p>16 Q. (BY MR. FORD) You can answer.</p> <p>17 A. Does winning mean that the citizens that come</p> <p>18 through the justice system gets treatment? If that is</p> <p>19 the case, yes, I want Tarrant County to win to be able</p> <p>20 to provide treatment for our citizens that get in</p> <p>21 trouble because of drugs.</p> <p>22 Q. Do you intend to testify at trial in this</p> <p>23 case?</p> <p>24 A. If I'm subpoenaed.</p> <p>25 Q. Would a win at trial, do you think it would</p>	<p style="text-align: right;">Page 96</p> <p>1 A. No.</p> <p>2 MS. AYACHI: Objection, form.</p> <p>3 Q. (BY MR. FORD) Are you aware of any Kroger</p> <p>4 pharmacist dispensing a prescription for an opioid</p> <p>5 medication that the pharmacist knew was medically</p> <p>6 unnecessary?</p> <p>7 A. I am not aware of that.</p> <p>8 MS. AYACHI: Objection, form.</p> <p>9 MR. FORD: You know, that's -- I think</p> <p>10 that's it. Can I take a three-minute break --</p> <p>11 THE WITNESS: Sure.</p> <p>12 MR. FORD: -- just to look it over real</p> <p>13 quick?</p> <p>14 THE WITNESS: Yes.</p> <p>15 THE VIDEOGRAPHER: All right. We're off</p> <p>16 the record at 12:25 p.m.</p> <p>17 (Break from 12:25 p.m. to 12:29 p.m.)</p> <p>18 THE VIDEOGRAPHER: We are back on the</p> <p>19 record at 12:30 p.m.</p> <p>20 MR. FORD: Ms. Bennett-Wright, I've got</p> <p>21 nothing else. I want to say thank you for your time</p> <p>22 today and enjoy your vacation. I'm sorry it started out</p> <p>23 this way, and I will pass it on to counsel for Kroger if</p> <p>24 she has any questions.</p> <p>25 MS. AYCOCK: I'm not going to have any</p>
<p style="text-align: right;">Page 95</p> <p>1 help the CCA in any way?</p> <p>2 A. Not to my knowledge.</p> <p>3 Q. If Tarrant County were to receive money, you</p> <p>4 know, from this case, either from a jury verdict award</p> <p>5 or a settlement amount, would you expect the CCA to be</p> <p>6 given any portion of that settlement money?</p> <p>7 A. No.</p> <p>8 MS. AYACHI: Objection, form.</p> <p>9 Q. (BY MR. FORD) Okay. You know, we talked a</p> <p>10 little bit about the word "diversion" today.</p> <p>11 A. Uh-huh, yes.</p> <p>12 Q. Do you remember how I was using it in terms</p> <p>13 of, you know, relating to controlled substances?</p> <p>14 A. Yes.</p> <p>15 Q. Are you aware of any Albertsons pharmacists</p> <p>16 dispensing a prescription for an opioid medication that</p> <p>17 the pharmacist knew would be used for something illegal?</p> <p>18 A. I'm not aware.</p> <p>19 Q. Are you aware of any Kroger pharmacist</p> <p>20 dispensing a description for an opioid medication that</p> <p>21 the pharmacist knew would be used for something illegal?</p> <p>22 A. I am not aware of that.</p> <p>23 Q. Are you aware of any Albertsons pharmacist</p> <p>24 dispensing an opioid that the pharmacist knew was</p> <p>25 medically unnecessary?</p>	<p style="text-align: right;">Page 97</p> <p>1 questions today. Thank you.</p> <p>2 MS. AYACHI: On behalf of Tarrant County,</p> <p>3 we deeply appreciate the work you've done, the time</p> <p>4 you've spent. We hope you have a great vacation.</p> <p>5 Again, sorry you had to start off this way.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 THE VIDEOGRAPHER: All right. We're off</p> <p>8 the record at 12:31 p.m.</p> <p>9 (Proceedings ended at 12:31 p.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 98</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2 The undersigned Certified Shorthand Reporter</p> <p>3 licensed in the State of Texas does hereby certify:</p> <p>4 I am authorized to administer oaths or</p> <p>5 affirmations, and prior to being examined, the witness</p> <p>6 was duly administered an oath by me.</p> <p>7 I am not a relative or employee or attorney or</p> <p>8 counsel of any of the parties, nor am I a relative or</p> <p>9 employee of such attorney or counsel, nor am I</p> <p>10 financially interested in the outcome of this action.</p> <p>11 I am the deposition officer who</p> <p>12 stenographically recorded the testimony in the foregoing</p> <p>13 deposition, and the foregoing transcript is a true</p> <p>14 record of the testimony given by the witness.</p> <p>15 Before completion of the deposition, review of</p> <p>16 the transcript [X] was [] was not requested. If</p> <p>17 requested, any changes made by the deponent (and</p> <p>18 provided to the reporter) during the period allowed are</p> <p>19 appended hereto.</p> <p>20 In witness whereof, I have subscribed my name</p> <p>21 this 8th day of September, 2023.</p> <p>22</p> <p>23 <i>Julie C. Brandt</i></p> <p>24 Julie C. Brandt, CSR, RMR, CRR</p> <p>25 TX CSR No. 4018, Exp. 10/31/23</p>	<p style="text-align: right;">Page 100</p> <p>1 DEPOSITION REVIEW</p> <p>2 CERTIFICATION OF WITNESS</p> <p>3 ASSIGNMENT REFERENCE NO: 6059392</p> <p>4 CASE NAME: National Prescription Opiate Litigation - Track 9</p> <p>5 (Tarrant County) v.</p> <p>6 DATE OF DEPOSITION: 8/28/2023</p> <p>7 WITNESS' NAME: Cheryl Bennett-Wright</p> <p>8 In accordance with the Rules of Civil</p> <p>9 Procedure, I have read the entire transcript of</p> <p>10 my testimony or it has been read to me.</p> <p>11 I have made no changes to the testimony</p> <p>12 as transcribed by the court reporter.</p> <p>13</p> <p>14 Date Cheryl Bennett-Wright</p> <p>15 Sworn to and subscribed before me, a</p> <p>16 Notary Public in and for the State and County,</p> <p>17 the referenced witness did personally appear</p> <p>18 and acknowledge that:</p> <p>19</p> <p>20 They have read the transcript;</p> <p>21 They signed the foregoing Sworn</p> <p>22 Statement; and</p> <p>23 Their execution of this Statement is of</p> <p>24 their free act and deed.</p> <p>25</p> <p>I have affixed my name and official seal</p> <p>this _____ day of _____, 20____.</p> <p>Notary Public</p> <p>Commission Expiration Date</p>
<p style="text-align: right;">Page 99</p> <p>1 Veritext Legal Solutions</p> <p>2 1100 Superior Ave</p> <p>3 Suite 1820</p> <p>4 Cleveland, Ohio 44114</p> <p>5 Phone: 216-523-1313</p> <p>6 September 8, 2023</p> <p>7 To: Sadie Turner</p> <p>8 Case Name: National Prescription Opiate Litigation - Track 9 (Tarrant</p> <p>9 County) v.</p> <p>10 Veritext Reference Number: 6059392</p> <p>11 Witness: Cheryl Bennett-Wright Deposition Date: 8/28/2023</p> <p>12 Dear Sir/Madam:</p> <p>13 Enclosed please find a deposition transcript. Please have the witness</p> <p>14 review the transcript and note any changes or corrections on the</p> <p>15 included errata sheet, indicating the page, line number, change, and</p> <p>16 the reason for the change. Have the witness' signature notarized and</p> <p>17 forward the completed page(s) back to us at the Production address</p> <p>18 shown</p> <p>19 above, or email to production-midwest@veritext.com.</p> <p>20 If the errata is not returned within thirty days of your receipt of</p> <p>21 this letter, the reading and signing will be deemed waived.</p> <p>22 Sincerely,</p> <p>23 Production Department</p> <p>24</p> <p>25 NO NOTARY REQUIRED IN CA</p>	<p style="text-align: right;">Page 101</p> <p>1 DEPOSITION REVIEW</p> <p>2 CERTIFICATION OF WITNESS</p> <p>3 ASSIGNMENT REFERENCE NO: 6059392</p> <p>4 CASE NAME: National Prescription Opiate Litigation - Track 9</p> <p>5 (Tarrant County) v.</p> <p>6 DATE OF DEPOSITION: 8/28/2023</p> <p>7 WITNESS' NAME: Cheryl Bennett-Wright</p> <p>8 In accordance with the Rules of Civil</p> <p>9 Procedure, I have read the entire transcript of</p> <p>10 my testimony or it has been read to me.</p> <p>11 I have listed my changes on the attached</p> <p>12 Errata Sheet, listing page and line numbers as</p> <p>13 well as the reason(s) for the change(s).</p> <p>14 I request that these changes be entered</p> <p>15 as part of the record of my testimony.</p> <p>16</p> <p>17 I have executed the Errata Sheet, as well</p> <p>18 as this Certificate, and request and authorize</p> <p>19 that both be appended to the transcript of my</p> <p>20 testimony and be incorporated therein.</p> <p>21</p> <p>22 Date Cheryl Bennett-Wright</p> <p>23 Sworn to and subscribed before me, a</p> <p>24 Notary Public in and for the State and County,</p> <p>25 the referenced witness did personally appear</p> <p>and acknowledge that:</p> <p>They have read the transcript;</p> <p>They have listed all of their corrections</p> <p>in the appended Errata Sheet;</p> <p>They signed the foregoing Sworn</p> <p>Statement; and</p> <p>Their execution of this Statement is of</p> <p>their free act and deed.</p> <p>I have affixed my name and official seal</p> <p>this _____ day of _____, 20____.</p> <p>Notary Public</p> <p>Commission Expiration Date</p>

1	ERRATA SHEET
2	VERITEXT LEGAL SOLUTIONS MIDWEST
3	ASSIGNMENT NO: 6059392
4	PAGE/LINE(S) / CHANGE /REASON
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20	Date Cheryl Bennett-Wright
21	SUBSCRIBED AND SWORN TO BEFORE ME THIS
22	DAY OF , 20 .
23	
24	Notary Public
25	Commission Expiration Date